

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF WHATCOM

MARGRETTY RABANG, and ROBERT
RABANG,

Plaintiffs,

v.

RORY GILLIAND, MICHAEL ASHBY,
ANDY GARCIA, RAYMOND DODGE, and
JOHN DOES 1-10,

Defendants.

Case No.: 17-2-00163-1

**DEFENDANT CHIEF JUDGE
RAYMOND G. DODGE JR.'S MOTION
TO DISMISS**

I. RELIEF REQUESTED

COMES NOW, Defendant Nooksack Tribal Court Chief Judge Raymond G. Dodge, Jr. ("Judge Dodge"), and hereby respectfully moves the Court to dismiss plaintiffs' claims as to him with prejudice under CR 12(b)(1) or CR 12(b)(6).

II. STATEMENT OF FACTS

Judge Dodge assumes as true for purposes of the CR 12(b)(6) motion plaintiffs' factual allegations in their complaint. *Bowman v. John Doe*, 104 Wn.2d 181, 183, 704 P.2d 140 (1985) (internal citation omitted). However, labels, conclusions, formulaic recitations of the elements of a cause of action, and naked assertions devoid of factual enhancement are not taken as true. *E.g.*, *Baldwin v. Sisters of Providence in Wash., Inc.*, 112 Wn.2d 127, 132, 769 P.2d 298 (1989).

III. STATEMENT OF ISSUES

1. Whether the doctrine of judicial immunity bars plaintiffs' claims asserted against Judge Dodge for routine judicial conduct.

2. Whether the Court lacks subject matter jurisdiction over plaintiffs' claims that require interpretation and construction of the laws of the Nooksack Indian Tribe.

3. Whether plaintiffs have failed to sufficiently plead facts supporting each element of their intentional infliction of emotional distress tort claim.

4. Whether plaintiffs have failed to sufficiently plead facts supporting each element of their negligent infliction of emotional distress tort claim.

5. Whether the Court should award Judge Dodge his attorneys' fees under RCW 4.84.185 should he prevail in this motion.

IV. EVIDENCE RELIED UPON

Judge Dodge relies upon the complaint, as well as his declaration and the exhibits attached thereto filed herewith.¹

V. AUTHORITY

A. Plaintiffs' Complaint Should Be Dismissed Under CR 12(b)(1)

Plaintiffs' complaint should be dismissed with prejudice because the suit against Judge Dodge is barred by judicial immunity. *Outsource Servs. Mgmt., LLC v. Nooksack Bus. Corp.*, 172 Wn.App. 799, 292 P.3d 147, 151 review granted, 304 P.3d 115 (2013) (finding that on a CR 12(b)(1) motion to dismiss for lack of subject matter jurisdiction, the party asserting jurisdiction bears the burden of establishing subject matter jurisdiction). In addition, plaintiffs are asking the Court to second guess the Nooksack Tribal Court and intervene in intra-tribal disputes involving Nooksack Tribal laws that lie outside of the Court's subject matter jurisdiction.

¹ Where a plaintiff founds allegations in a complaint on specific documents, but does not physically attach those documents to the complaint, said documents may be considered in ruling on a CR 12(b)(6) motion. *Sebek v. City of Seattle*, 172 Wn. App. 273 n.2, 290 P. 3d 159 (2012).

1 **1. Judge Dodge is Entitled to Judicial Immunity**

2 **a. Judge Dodge, Like All Jurists, Has Absolute Immunity for**
3 **Actions Taken in His Judicial Capacity**

4 It is well-settled under common law that judges are absolutely immune from suits in tort
5 that arise from acts performed within their judicial capacity. *Lallas v. Skagit Cty.*, 167 Wn.2d
6 861, 864, 225 P.3d 910, 911 (2009). This liability extends to protecting judges even where they
7 are accused of acting maliciously and corruptly. *Filan v. Martin*, 38 Wn. App. 91, 96, 684 P.2d
8 769, 772 (1984). Judicial immunity protects judicial officials from suit in their personal capacity.
9 See *Babcock v. State*, 116 Wn.2d 596, 620–21, 809 P.2d 143, 156 (1991) (immunity is a personal
10 defense because it applies to all members of a class as a matter of public policy). Although
11 Washington State has not addressed judicial immunity for tribal court judges, other jurisdictions
12 have held that they are entitled to the same absolute judicial immunity that shields state and
13 federal court judges. *Penn v. United States*, 335 F.3d 786, 789 (8th Cir. 2003).

14 Judicial immunity rests on considerations of public policy. *Adkins v. Clark Cty.*, 105
15 Wn.2d 675, 677, 717 P.2d 275, 276 (1986). It exists to protect justice by ensuring that judges can
16 “administer justice without fear of personal consequences.” *Kelley v. Pierce Cty.*, 179 Wn. App.
17 566, 573, 319 P.3d 74 (2014); *Adkins*, 105 Wn.2d at 677. A judge has the duty to decide all cases
18 that are brought before him, “including controversial cases that arouse the most intense feelings
19 in the litigants.” *Filan*, 38 Wash. App. at 96 (quoting *Burgess v. Towne*, 13 Wn. App. 954, 957,
20 538 P.2d 559, 561 (1975)). Thus, a judge “should not have to fear that unsatisfied litigants may
21 hound him with litigation charging malice or corruption” because that fear “would contribute not
22 to principled and fearless decision-making but to intimidation.” *Filan*, 38 Wn. App. at 96; see
23 also *Taggart v. State*, 118 Wn.2d 195, 203, 822 P.2d 243, 247 (1992) (“If disgruntled litigants
24 could raise civil claims against judges, then ‘judges would lose that independence without which
25 no judiciary can either be respectable or useful.’”).

26 Plaintiffs have sued Judge Dodge in his personal capacity for actions alleged to have
27 occurred while he was acting as Chief Judge of the Nooksack Tribal Court. Compl. ¶ 11.

1 Plaintiffs assert “extreme and outrageous” conduct and the intentional infliction of emotional
2 distress based on a series of alleged acts by Judge Dodge relating to the unlawful detainer action
3 to which Ms. Rabang was a party. *Id.* ¶ 39. Among other acts, Plaintiffs allege wrongdoing by
4 Judge Dodge for: hearing the unlawful detainer lawsuit against Ms. Rabang; refusing to delay the
5 unlawful detainer trial; issuing an eviction order; and issuing two orders to show cause. *Id.*
6 Each of these actions is alleged to have occurred after Judge Dodge was appointed as Chief
7 Judge by the Nooksack Tribal Council on June 13, 2016. *Id.* ¶ 15. Accordingly, Judge Dodge is
8 immune from both suit and liability for these and any other actions taken in his judicial capacity.

9 **b. Plaintiffs Have Failed to Establish That Judge Dodge Was**
10 **Acting Outside His Judicial Capacity or in the Clear Absence**
11 **of Jurisdiction**

12 Judicial immunity applies to judges only when they are acting in a judicial capacity and
13 with color of jurisdiction. *Adkins*, 105 Wn.2d at 677–78. To determine whether immunity
14 applies, Washington courts have adopted a “functional approach” whereby they review the
15 function being performed rather than the person who is performing it. *Lallas*, 167 Wn.2d at 865;
16 *Taggart*, 118 Wn.2d at 210. Acts by a judge or judicial officer will therefore be protected by
17 immunity from civil action for damages if they are “intimately associated with the judicial
18 process.” *Mauro v. Kittitas Cy.*, 26 Wn.App. 538, 540, 613 P.2d 195, 196 (1980). Conversely,
19 when a judge takes actions that are ministerial and not judicial in nature, judicial immunity does
20 not attach. *Mauro*, 26 Wn. App. at 541 (judicial immunity did not shield county from suit based
21 on employee who failed to deliver judge’s signed order); *Lallas*, 167 Wn.2d 861 (sheriff’s
22 deputy not entitled to immunity for escorting a prisoner to jail).

23 A judge must also be acting within the color of jurisdiction for immunity to apply. A
24 judge is immune from civil suit if he performs a judicial act with “jurisdiction over the subject
25 matter and person.” *Burgess*, 13 Wn. App. at 958. Jurisdiction, for purposes of judicial
26 immunity, should be construed broadly so that a judge will not be subject to possible liability
27 unless he acts without color of authority. *Id.* Thus, even where a judge or judicial officer is

1 without *actual authority* to perform an act, if it is within the “color of her authority” to do, the
2 judge will be immune from suit and liability for that act. *Adkins*, 105 Wn.2d at 678 (bailiff who
3 improperly provided dictionary to jury was protected by judicial immunity for liability from
4 damages caused by mistrial).

5 Although there are few Washington cases which further interpret this requirement, the
6 Washington test is similar if not identical to the federal test, which applies immunity to actions
7 which are not taken in the “complete absence of all jurisdiction.” *Mireles v. Waco*, 502 U.S. 9,
8 12 (1991). At the federal level, circuit courts have found that a judicial officer acts in the clear
9 absence of jurisdiction only if he “knows that he lacks jurisdiction, or acts despite a clearly valid
10 statute or case law expressly depriving him of jurisdiction.” *Mills v. Killebrew*, 765 F.2d 69, 71
11 (6th Cir. 1985) (citing *Rankin v. Howard*, 633 F.2d 844, 849 (9th Cir. 1980)). Thus, courts have
12 held that judges enjoy judicial immunity even when there are procedural defects in their
13 appointment where they are “discharging the duties of that position under the color of authority.”
14 *White by Swafford v. Gerbitz*, 892 F.2d 457, 462 (6th Cir. 1989); *see also Wagshal v. Foster*, 28
15 F.3d 1249, 1254 (D.C. Cir. 1994).

16 Here, plaintiffs fail to allege that the actions taken by Judge Dodge were outside the
17 scope of his judicial capacity or taken in the clear absence of all jurisdiction. Using
18 Washington’s approach of reviewing the function performed rather than the person performing it
19 reveals that the actions taken by Judge Dodge are indeed “intimately associated with the judicial
20 process.” The acts complained of by plaintiffs are routine judicial tasks that are typical to an
21 unlawful detainer action, including convening a lawsuit and issuing orders. Moreover, even the
22 alleged acts which ostensibly fall outside the scope of the unlawful detainer action—such as
23 allegedly “rejecting Mrs. Rabang’s responsive pleadings”—is still judicial in nature. Compl.
24 ¶ 39. Even if the allegations against Judge Dodge are taken as asserted and assumed to be driven
25 by malice and corruption, they are nonetheless well within the scope of a judge’s authority.
26
27

1 Further, plaintiffs fail to allege that Judge Dodge acted outside the color of his authority.
2 Although plaintiffs allege as a matter of law that Defendant Dodge's appointment was *ultra vires*
3 and *void ab initio*, they have not alleged that he acted with the knowledge that he lacked
4 jurisdiction or in spite of a clearly valid statute or case depriving him of jurisdiction. *Id.* ¶15.
5 Further, the complaint alleges that Ms. Rabang sought declaratory judgments from the court
6 regarding the authority of the Nooksack Tribal Council on at least two separate occasions.
7 *Id.* ¶¶ 16, 20. The second time Ms. Rabang states she sought such a judgment was in
8 October 2016, shortly after she had been served with an order which she now alleges as part of
9 the basis for her tort claim against Judge Dodge. The fact that Ms. Rabang sought an order from
10 Judge Dodge in one matter, but now asserts that the same court and judge lacked jurisdiction to
11 issue orders in the unlawful eviction case to which she was a party is simply untenable.² It does
12 not comport with reason that Judge Dodge could properly exercise jurisdiction to resolve certain
13 disputes in Nooksack Tribal Court while simultaneously lacking any and all jurisdiction to
14 resolve other routine matters involving the same parties during the same timeframe.

15 Judge Dodge is entitled to judicial immunity for each of the actions alleged in the
16 Complaint,³ and this lawsuit should be dismissed with prejudice pursuant to Rule 12(b)(1).
17
18

19 ² In fact, in a Federal case filed by these plaintiffs against various Tribal officials including,
20 Judge Dodge, expressly allege that the Nooksack Tribal Court exists for "the legitimate business
21 purpose of providing a forum for the Tribal community to resolve disputes" and that Judge
22 Dodge and other Court staff "have had and do have legitimate governmental business" in that
23 capacity. *See Rabang, et al. v. Kelly, et al.*, No. 2:17-cv-00088-JCC (W.D. Wash., amended
24 Compl. filed Feb. 2, 2017, ¶ 104) (alleging RICO violations). *See Ex. D to Dodge Decl.*
25 Plaintiffs are trying to have it both ways by splitting their causes of action and alleging
26 conflicting facts in two different fora. Many of the same action of Judge Dodge in this case are
27 used as a basis for RICO relief in the Federal matter. *See id.* ¶¶ 49, 67-68.

³ There is no allegation that Ms. Rabang appealed the Tribal Court order. In fact, this Court may
take judicial notice of the fact that Ms. Rabang already filed a collateral attack in Whatcom
County Superior Court, alleging claims of trespass and seeking a writ of restitution restoring her
to her property. The Whatcom County Superior Court dismissed Ms. Rabang's suit for lack of
subject matter jurisdiction. *Rabang v. Gilliland, et al.*, No. 16-2-02029-8. Ms. Rabang did not
appeal the dismissal.

1 **2. Plaintiffs' Complaint Requires Resolution of Tribal Law Matters**

2 The Court should refuse to exercise jurisdiction over plaintiffs' tort claims in this case
3 because, at bottom, plaintiffs are complaining about various judicial actions taken Judge Dodge
4 pursuant to his appointment by the Nooksack Tribal Council under Nooksack Tribal law, to
5 which state law does not apply and this Court lacks jurisdiction to enjoin or overturn.⁴
6 Compl. ¶¶ 14-15, 23-34, 39. The judicial actions taken by Judge Dodge lie outside of the reach
7 of this Court, and are not subject to collateral attack. *See* RCW 37.12.060; *Milam v. U.S. Dep't*
8 *of Int.*, 10 Indian L. Rep. 3013, 3015 (D. D.C. 1982) (ordinarily, disputes "involving intratribal
9 controversies based on rights allegedly assured by tribal law are not properly the concerns of the
10 federal courts"); *Runs After v. United States*, 766 F.2d 347, 352 (8th Cir. 1985) (affirming district
11 court's holding that "resolution of . . . disputes involving questions of interpretation of the tribal
12 constitution and tribal law is not within the jurisdiction of the . . . court"); *Sac & Fox Tribe of the*
13 *Mississippi in Iowa, Election Bd. v. Bureau of Indian Affairs*, 439 F.3d 832, 835 (8th Cir. 2006)
14 (holding "Jurisdiction to resolve internal tribal disputes [and] interpret tribal constitutions and
15 laws . . . lies with Indian tribes and not in the district courts"); *Lewis v. Norton*, 424 F.3d 959,
16 960 (9th Cir. 2005) (recognizing that Indian tribes are distinct, independent political
17 communities that retain their natural rights in matters of local self-government). The claims
18 should be dismissed with prejudice.

19 **B. Plaintiffs Complaint Should Be Dismissed for Failure to State a Claim**

20 Even if this Court deems that it may exercise subject matter jurisdiction over the
21 complaint, plaintiffs' complaint should be dismissed under CR 12(b)(6) for failure to state a
22 claim as to Judge Dodge.

23 Under CR 12(b)(6), a trial court may grant dismissal for failure to state a claim only if
24 "it appears beyond doubt that the plaintiff can prove no set of facts, consistent with the

25 _____
26 ⁴ Litigation challenging the actions of the United States upon which plaintiffs rely to allege
27 invalidity of Judge Dodge's actions (Compl. ¶¶ 26, 34) is currently pending in Federal Court in
Seattle. *See Nooksack Indian Tribe v. Haugrud, et al.*, No. 17-219-TSZ (W.D. Wash., filed
Feb. 13, 2017).

1 complaint, which would entitle the plaintiff to relief.” *Bowman v. John Doe*, 104 Wn.2d 181,
2 183, 704 P.2d 140 (1985) (internal citation omitted). Such is the case here. Washington law
3 requires a plaintiff to prove *all* elements of the cause of action. *See, e.g., Western Wash.*
4 *Laborers-Employers Health & Sec. Trust Fund v. Merlino*, 29 Wn. App. 251, 255, 627 P.2d
5 1346 (1981). As explained below, plaintiffs have not sufficiently plead facts supporting each
6 element of intentional infliction of emotional distress (“IIED”) and negligent infliction of
7 emotional distress (“NIED”).

8 **1. Plaintiffs Fail to Sufficiently Plead Facts Supporting IIED**

9 To recover for intentional infliction of emotional distress, a plaintiff must prove
10 (1) extreme and outrageous conduct, (2) intentional or reckless infliction of emotional distress,
11 and (3) actual severe emotional distress on the plaintiff’s part. *Snyder v. Med. Serv. Corp. of E.*
12 *Wash.*, 145 Wn.2d 233, 242, 35 P.3d 1158 (2001). Liability for intentional infliction of
13 emotional distress exists when conduct is so outrageous in character and so extreme in degree, as
14 to go beyond all possible bounds of decency, and to be regarded as atrocious and utterly
15 intolerable in a civilized community. *Grimsby v. Samson*, 85 Wn.2d 52, 59, 530 P.2d 291
16 (1975). Consequently, IIED “‘does not extend to mere insults, indignities, threats, annoyances,
17 petty oppressions, or other trivialities.’ In this area plaintiffs must necessarily be hardened to a
18 certain degree of rough language, unkindness and lack of consideration.” *Id.* (quoting
19 Restatement (Second) of Torts § 46 cmt. d).

20 Plaintiffs’ IIED claim fails for two reasons. First, none of the actions described in the
21 complaint reach the required extreme or outrageous conduct. Holding court and issuing orders,
22 even if those orders issue a few days before a federal holiday, are not close to sufficient.⁵
23 Compl. ¶¶ 33, 39. No reasonable person could conclude from the allegations that Judge Dodge’s
24

25 ⁵ In addition, Judge Dodge, by plaintiffs’ own pleading, could not have taken some of the actions.
26 Plaintiffs allege Judge Dodge was appointed on June 13, 2016. Compl. ¶ 15. Inexplicably,
27 plaintiff then assigns blame to Judge Dodge for not holding a hearing on April 29, 2016 (almost
two months *before* his appointment). *Id.* ¶¶ 16, 39. Moreover, judges do not “convene”
lawsuits; plaintiffs do, by filing complaints. *Id.* ¶¶ 20, 23.

1 judicial conduct was “outrageous.” Simply saying as much – or being subject to court orders
2 that rule against you – does not make it so. Being subject to litigation does not make for an
3 intentional tort. *See Grimsby*, 85 Wash.2d at 59 (noting that filing suit alleging sexual abuse by a
4 physician, even with malicious intent, is not “so outrageous in character, [and] so extreme in
5 degree, as to go beyond all possible bounds of decency” and to be “utterly intolerable in a
6 civilized community.”) (internal citation omitted). As our courts have observed, “Our
7 experience tells us that mental distress is a fact of life.” *Hunsley v. Giard*, 87 Wash.2d 424, 434-
8 35, 553 P.2d 1096 (1976) (“Not every act which causes harm results in legal liability.”).

9 Second, simply alleging “Plaintiffs suffered legally compensable emotional distress
10 damages” is insufficient for the damages element. Compl. ¶ 39. The complaint is silent as to
11 how Judge Dodge holding court and issuing orders intentionally and proximately caused harm to
12 each of the plaintiffs, or what that emotional harm might be. *Id.* ¶ 5.5.1; *see also* Exs. to Dodge
13 Decl. Emotional distress includes “all highly unpleasant mental reactions, such as fright, horror,
14 grief, shame, humiliation, embarrassment, anger, chagrin, disappointment, worry, and nausea.”
15 *Kloepfel v. Bokor*, 149 Wn.2d 192, 197-98, 66 P.3d 630 (2003) (intentional infliction of
16 emotional stress when, under a no-contact order, defendant threatened to kill his former
17 girlfriend, threatened to kill the man she was dating, watched her house, called her home 640
18 times, called her work 100 times, and called the homes of men she knew numerous times,
19 causing her great distress and forcing her to spend weekends away from home to avoid
20 defendant); *but see Womack v. Von Rardon*, 133 Wn.App. 254, 257, 261, 135 P.3d 542 (2006)
21 (no intentional infliction of emotional stress when three juveniles took appellant’s cat from her
22 front porch to a nearby school and, using gasoline, set the cat on fire). Alleging “debilitating
23 fear” from routine court orders that would have to be carried out by others is not the severe
24 emotional harm required by the tort. Compl. ¶37. Importantly, plaintiffs have not alleged that
25 any eviction has actually taken place – it appears that Ms. Rabang has neither vacated the
26 premises nor been removed.

1 Judge Dodge simply issued orders at the end of the calendar year with which plaintiffs
2 disagree. If that were a tort, every losing litigant could be a plaintiff, and every judge and
3 opposing counsel defendants. The claim should be dismissed.

4 **2. Plaintiffs Fail to Sufficiently Plead Facts Supporting NIED**

5 To recover for negligent infliction of emotional distress, plaintiffs must prove the
6 negligence elements of duty, breach, causation, and damages, as well as objective
7 symptomatology. *Kloepfel*, 149 Wn.2d at 199. Plaintiffs fail at least three of these elements.

8 To satisfy the objective symptomatology requirement, “a plaintiff’s emotional distress
9 must be susceptible to medical diagnosis and proved through medical evidence.” *Hegel v.*
10 *McMahon*, 136 Wn.2d 122, 135, 960 P.2d 424 (1998). Plaintiffs allege no facts indicating
11 objective symptomatology. There are no allegations of medical evidence, let alone facts
12 indicating what emotional distress plaintiffs have actually suffered.

13 In addition, plaintiffs also fail to sufficiently plead the damages element. Again, simply
14 stating that “Plaintiffs suffered legally compensable emotional distress damages” is insufficient
15 for the damages element. Compl. ¶ 46. Washington courts have attempted to limit NIED
16 recovery to those individuals who are most likely to be severely impacted by “‘the shock caused
17 by the perception of an especially horrendous event’,” and plaintiffs fall outside of this narrow
18 category. *Colbert v. Moomba Sports, Inc.*, 163 Wn.2d 43, 54, 176 P.3d 497 (2008).

19 Plaintiffs also fail to plead duty. Plaintiff simply state that all “Defendants’ owed a duty
20 to Plaintiffs to act as reasonable, prudent persons.” *Id.* ¶¶ 43, 44. But, duty is more than this.
21 “The existence of a duty is a question of law and depends on mixed considerations of ‘logic,
22 common sense, justice, policy, and precedent.’” *Lords v. N. Auto. Corp.*, 75 Wn.App. 589, 596,
23 881 P.2d 256 (1994) (internal quotation omitted). Plaintiffs fail to clearly articulate what duty
24 they would have the Court impose on Judge Dodge. There is no duty for trial court judge to
25 provide litigants with a stress free environment. For all these reasons, the negligent infliction
26 claim should be dismissed.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7

2
3
4
5
6
7

8

901

2

3

+

5
6
7
8
9

CERTIFICATE OF SERVICE

I certify that on March 9, 2017, I caused to have served a true and correct copy of
DEFENDANT CHIEF JUDGE RAYMOND G. DODGE JR.'S MOTION TO DISMISS, on
the following by the method(s) indicated below:

Gabe Galanda
gabe@galandabroadman.com
Galanda Broadman, PLLC
8606 35th Ave NE, Suite L1
PO Box 15146
Seattle, WA 98115

Attorney for Plaintiffs

<input type="checkbox"/>	E-Service (via the Clerk)
<input type="checkbox"/>	Hand-Delivery
<input checked="" type="checkbox"/>	U.S. Mail, Postage Prepaid
<input checked="" type="checkbox"/>	Email
<input type="checkbox"/>	Facsimile

Rickie W. Armstrong
rarmstrong@nooksack-nsn.gov
Nooksack Indian Tribe – Office of Tribal Attorney
P.O. Box 63
5047 Mt. Baker Hwy
Deming, WA 98244

<input type="checkbox"/>	E-Service (via the Clerk)
<input type="checkbox"/>	Hand-Delivery
<input checked="" type="checkbox"/>	U.S. Mail, Postage Prepaid
<input checked="" type="checkbox"/>	Email
<input type="checkbox"/>	Facsimile

*Attorneys for Defendants Rory Gilliland,
Michael Ashby, Andy Garcia, John Does 1-10*

DATED this 9th day of March, 2017.

Kilpatrick Townsend & Stockton LLP

By: _____

Rob Roy Smith, WSBA # 33798
rrsmith@kilpatricktownsend.com
*Attorney for Defendant Chief Judge
Raymond G. Dodge, Jr.*