

***Hiring to Firing* - "What Can the Show *Severance* Teach Us About Trade Secrets?"**

Hosts: Tracey Diamond and Evan Gibbs

Guests: Tim Londergan (Tangibly) and Will Taylor (Troutman Pepper)

Tracey Diamond:

Welcome to *Hiring to Firing*, the podcast. I'm Tracey Diamond and I'm here with my co-host, Evan Gibbs. We are both labor and employment attorneys with the law firm of Troutman Pepper and provide advice and counseling on all employment decisions from hiring to firing. Today, we welcome our partner, Will Taylor, in the business litigation group who focuses on complex business disputes involving trade secrets, misappropriation, among other things. We also welcome our special guest, Tim Londergan, CEO of Tangibly, a trade secrets management software company. Thank you both for joining us. Will, why don't you start off by telling us a bit about your practice.

Will Taylor:

Thanks Tracey. I protect our client's most sensitive business information. That often involves investigating whether trade secret misappropriation occurred. And if we think it did, using state and federal trade secret laws to try to prevent that misappropriation from continuing and, or seeking damages for that misappropriation.

Tracey Diamond:

Sounds like a lot of work. Tim, what about you? Tell us about your company and how it helps businesses protect their confidential data.

Tim Londergan:

Thanks, Tracey. Good to be here. Tangibly is a SaaS platform, that we help companies implement best practices to manage their trade secrets via software. So a lot of people like to think of us as basically compliance software for trade secret management.

Evan Gibbs:

As our listeners know, the TV show, *Severance*, provides us with a lot to discuss about so many aspects of the office environment. Well, one of our previous episodes, we focused on work-life balance using this television show. And today we're going to use the show again as a jumping off point to discuss keeping trade secrets secret.

Tracey Diamond:

As a reminder, the show tells the story of a group of employees who have agreed to undergo a surgical procedure that renders them unable to remember anything about their personal lives when they're at work and unable to remember anything about their work lives when they're home. Here is a clip where one of the main characters, Helly R., explains in a video to her work self what just happened to her.

Helly:

My name is Helly R. I'm making this video roughly two hours before it will be shown to me. I have of my own free accord elected to undergo the procedure colloquially known as severance. I give consent for my perceptual chronologies to be surgically split, separating my memories between my work life and my personal life. I acknowledge that henceforth my access to my memories will be spatially dictated. I will be unable to access outside recollections whilst on Lumon's severed basement floor nor retain work memories upon my ascent. I am aware that this alteration is comprehensive and irreversible. I make these statements freely.

Tracey Diamond:

Severing employees work memories from their home life certainly makes it easier to control company's trade secrets, but not exactly real life. In real life, Tim, what can companies do to protect their confidential information?

Tim Londergan:

The way that we've architected our platform is really around this triumphant. You've got the asset itself, the trade secret. You have an identity; who has access to that trade secret, and then you've got a contract with the identity, right? And so it's really getting those three things right. And it really starts with the documentation around the asset itself. And what some recent case law from last year teaches is that the courts are getting a little more specific in terms of demands, meaning there's no longer the ability to argue this idea that it's institutional knowledge. Everybody on the manufacturing floor knows what the secret is. It has to be documented somewhere. And so that's a big step one. Step two is knowing who has access to it. And then step three is whoever has access to it, whether it's someone inside or someone outside, ensuring they have the right contracts in place to properly protect it.

Tracey Diamond:

So how does your company help with all of that?

Tim Londergan:

We have built basically a workflow solution. And so guide you through that process. It asks you the questions. It gives you a little green check boxes when you've done things right and lots of red alerts, if you need follow up. And on top of those three big buckets, the other thing we do is we've built a workflow that basically helps you to alert folks that they have access to your trade secret. So it's basically digital acknowledgement workflow. We've got digital signatures integrated. And then the last thing that we do is we've got training as part of our platform. So, again, it's, e-learning, embedded, it's very simple, very straightforward, quick to the point. And what we find is that building a culture of awareness is super important in managing these assets.

Evan Gibbs:

One issue that I've faced is for example, in the manufacturing space, your floor employees, they'll get some trade secret information and it filters down and you've got people that are

saving stuff to, for example, external hard drives or saving trade secrets locally on their, maybe their work computer, or maybe it's a home computer. Maybe they work from home some; save it there. In terms of managing that process, is that something that your training would encompass or your workflow accounts for to work with clients and make sure we're finding and identifying all the trade secrets that maybe have disseminated from a central source?

Tim Londergan:

Evan, there's a lot there. And so you bring up remote work, which is a big issue. But I think if you just start at the top, it's like, what are these operational trade secrets? And so we like to dissect between two big buckets. Like operational trade secrets, these are things that make the company work, right? They're happening every day. In some cases, a lot of people know about them, maybe a few more than should know about them, but go get those things well documented. And I think that's always our first guidance for new customers, is just go get that important stuff tackled, right?

If that stuff is misappropriated, a lot of the value is gone very quickly. And then there's the innovation workflows. So stuff that's being developed on a day-to-day basis. And that, again, is the tougher problem to solve because it's a daily occurrence in most innovative companies. And so, again, we give guidance on how to think about that, but again, what we find is every company's got a little bit of a different view on how they should be documenting and implementing at that level.

Evan Gibbs:

That's been my experience as well is that there's a lot of variation between companies, even in the same industry, making the exact same products, they'll treat a lot of this information not at all in the same way. You'll have one client will say, oh, this is extremely important. This is a highly valuable trade secret. And the other folks on the other side are saying, "No, everybody knows this. There's no way that's a trade secret." And there's lots of documents that aren't holy grail-type documents that maybe some argue about.

Tracey Diamond:

To that point, Evan, and I'd love for you to weigh in on this too, as litigators in the trade secret world, do you look at comparator evidence from how other third companies that are not parties to the lawsuit that are in the same industry, how they treat that type of information, or does that really not become relevant in these types of cases?

Will Taylor:

I think the relevance would be whether it's really a secret. To use Evan's point, if you have the same information at company A as you have at company B, can company A really say that's a secret? Probably not. Exactly how you'd get there, you'd probably need some industry expert to say, hey, everybody in that industry knows that thing. That's not a trade secret. But that's not really like just opposition, that is a defense that's put on and that defense can be successful. So, absolutely. I think as to whether that information is a secret in the industry is certainly pertinent. How another company treats its own trade secrets, I think, is probably more

implication of whether they can protect their trade secrets rather than whether another company in its field actually owns its own trade secrets.

Tracey Diamond:

I was thinking about it more in terms of broad categories of information, rather than the specific trade secret at issue. R and D information may be very specific to the company, but there may be some industry type data that some companies are treating as a trade secret and other companies are much more [lax] about. If they haven't bought Tim's product yet, they need to buy it, so they could type up their procedures.

Will Taylor:

And speaking of Tim's product, there's huge advantages in using a product like that for the litigator on the other end. So if we have a client who's used a Tangibly product, one thing we'd know right off the bat is that they have taken the steps to keep the information secret, because that's one of the things that the Tangibly product assists with. And it also helps with identifying the product itself. As Tim explained earlier, it's identifying those assets, so you know exactly what trade secrets you're talking about. Those are two of the challenges you have right away is somebody seeking to protect trade secrets is what exactly are they. You do have some companies that assume they have trade secrets, but don't have a great ability to describe exactly what they are. And then even if they do have them, the next challenge is what have they done over the years to protect them?

Have they always had NDAs in place? Have they always had protective agreements with the vendors they've worked with? Do they have strong company policies protecting that information? And the answer is, it really depends, and certainly not a given. And I think across the various sizes of US businesses, you might find better trade secret management in larger companies because they have more resources, but that's hardly a given. And then as you go down in the size of companies that don't have as many resources, they might have not been able to have the same protective agreements and the like over the years, because they don't have their own HR department.

Tangibly would fill some of that hole. And I don't mean that just as a plug of Tim's company, but I mean reacting to what he's describing as some of the benefits, they really would help a trade secret litigator really hit these various elements of a trade secret claim, which as I alluded to earlier, like you have to show it's a secret. You have to show what it is. And you have to do that. As Tim said, the courts are getting a little more strict. You have to be able to at least articulate that pretty early in the case rather than sometime down the line.

Tim Londergan:

Can I just add the way that you think about anything that's as complex as this, and Evan, to your point, everybody's a little different, is like standardization, right? And so one of the things that, again, we've just been driving ourselves towards this end goal, which is how do you help companies think about standardization when it comes to trade secrets? And so we built this tool and it's on our website. We just call it Tangibly Guide. And it really operates around a pretty simple premise, which is every company, doesn't matter if you're a services business or a big manufacturing company, your trade secrets fall into three buckets. You've got manufacturing

processes, you've got code, and then you have business process. And you can really bucket everything according to that hierarchy. And so that's been fun to see people's reaction to go, oh, well, if you go like into the business process bucket, for instance, and think about competitive intelligence, right?

We know something about the market that we developed this point of view on our own and it's driving how we're behaving as business. It's driving our pricing model, whatever. That stuff's super valuable. And it can be treated as a trade secret. And what we start to see that is people... I open people's eyes to this stuff. The other thing I'd say that just the overarching challenge here in this whole space is that if you actually look at the law, it's this reasonable measures language. Like, what's reasonable?

And so I think that's what's also been fun for us as we've built Tangibly is we've spent a lot of time with the litigators, including Will to say like, hey, when you show up and do discovery, what do you see? And you have a very common response from most litigators, which is you find a big mess. And so it's like, okay, well what do you want to see when you show up? And so that's the ethos around how we've built the platform.

Tracey Diamond:

Tim, any product, and I'm sure you've experienced this as always, only as good as the employees that are implementing it, what does Tangibly do for the non-compliant companies? Presumably they're paying for it, so they should be compliant, but I'm sure that there are situations where folks are not compliant. How do you help companies maintain compliance with the system?

Tim Londergan:

I will say, we are new enough that we've got enthusiastic early adopters at this stage of this company, but maybe to the more specific point is, hey, somebody's employment agreement is still unsigned, right? The system wants to know, where's the employment agreement? What date was it signed? Or the NDA's not here and, or when does it expire? Those kind of things are built into the system in terms of alerts. So if there's a laggard in terms of entering information, the system will let you know about it.

And I think on the implementation side, it's been a fun and fascinating launch over the last few months, which is trying to understand. And again, I think it comes back to this broader point, which is like, yeah, every company's a little different, right? You've got GCs, you've got heads of IP, you've got executive admins all playing a role in here, not to mention technology teams and business teams and so forth. Right? So we're seeing a little bit of everything in terms of how things are being implemented.

Tracey Diamond:

Great way for HR or the admins to keep track of things, for sure. One of the greatest threats to confidentiality is employee breaches, whether inadvertent or intentional. How often is a breach, inadvertent or intentional?

Will Taylor:

I could only give my personal reactions. I think that in my litigation experience, you're usually talking about the intentional circumstance where somebody does walk out the door with trade secrets on their laptop or in a briefcase. Those sorts of theft do happen. The inadvertent would probably be more treated in the situation of a breach situation where the employee has made a mistake and might be subject to some sort of censure for that, including firing, but not really in the trade secret context. Probably more like you breached the company policies by failing to protect your computer or something like that, or you might have a company that doesn't have great policies.

So I think the inadvertent situation absolutely happens. We just need to read the news to know that, but I think it's less of a trade secret issue than is the intentional taking of sensitive information.

Tracey Diamond:

I know that I've seen, and I think Evan, I'm sure you're going to say the same. Often employees may take something that will claim or truly think that what they took wasn't a trade secret, or they took it for their own personal reasons, whether it's because they want to prove some other kind of case against the company, or... I once had a case where an employee took a bunch of confidential HIPAA information because they thought they needed it to show that they were doing a good job, so that when they applied for unemployment, they would get unemployment compensation. So I think sometimes it'll turn on the employee's own belief as to whether something's a trade secret. Evan, have you seen something like that too?

Evan Gibbs:

My view of the world depends on whether my client's the plaintiff and the defendant. If I'm the plaintiff, it's always intentional. And if I'm the defendant, it's always an inadvertent theft.

Tracey Diamond:

There you go

Evan Gibbs:

Yeah, thank you. The inadvertent stuff, it really does happen a lot. And I think one of the issues we're going to talk about is the pandemic and how that's impacted this space. And I've had that come up in a number of cases where people say, well, I was working from home and the VPN is really slow accessing documents from our document management system. So I downloaded all of the important stuff that I need from my job to an external hard drive or something like that. That's one that I've seen coming up more and more, people working from home and putting stuff on some kind of local drive.

And I've seen a couple of cases fueled by that. It seems to have really become an issue. From my perspective, I've had clients and they're just certain like, oh, this is a bad actor that has stolen this stuff and they're intending to use, and I've, of course, had those situations. But a lot of times it really is. Even if I'm on the plaintiff side, I do think, well, I think this may have been inadvertent. I don't think this person meant to take it or they undervalued it inappropriately. We

do hear that all the time. That's not a trade secret. This is my document. I made this document. This is mine.

Tracey Diamond:

My personal IP. That's right. Tim, I know you wanted to follow Will. What are your thoughts here?

Tim Londergan:

No, this is all good stuff. So, my reaction to it was we're a venture funded company and one of the venture funds that did some diligence on us, one of the partners put together his analysis and he sent it to me and it was this interesting thing where he said, what Tangibly is going to help solve immediately is the roughly 50% of trade secret misappropriation that's inadvertent. People just simply don't know this stuff. And that was his view of the world that probably half the time it is inadvertent. And it does seem to jive with our own, what we hear from customers and potential customers is, yeah, they just don't know, like none of this stuff makes any sense. We just got to teach them and make sure that they understand, yeah, anything you're doing on company time is company property. It doesn't matter if it's open source code. We see that a lot. It's like, ah, it's all open source. Anyway, big opportunity for education, I think, is my key takeaway.

Tracey Diamond:

Training is key, for sure.

Will Taylor:

Training and I think technology catching up with the company's policies. So if company says you can't take stuff home, but then they have an incredibly slow VPN system or something like that, then the employee says, well, to get my job done, I'm going to have to find a workaround. And then by doing the workaround, they've inadvertently, in this sense, taking some trade secrets and gotten themselves in a world of trouble. There's something similar where a lot of us face where companies say, thou shall not use coffee shop's Wi-Fi, but then you travel four days a week. How can you possibly work without using publicly available Wi-Fi___33?

There is an issue of making sure that if you're going to make certain demands on your employees, that you make it possible for them to do their day-to-day work without running into the problem of, am I not getting my work done, or am I violating some rule about protection of this information? You need those to be in sync.

Tracey Diamond:

I think that's a fair point, Will. And it's something we've actually talked about on this podcast before as a floor. If a company wants to be able to maintain the secrecy of its important trade secrets, they have to give the employees the tools to get their work done, so that the employees don't try to do a workaround just with good intent because they're trying to get their work done.

Will Taylor:

Can I ask you, Tracey, one of the huge differences in *Severance*, versus the real world is now we've got this work from home trend and that is the complete opposite of *Severance*. *Severance* is about completely separating your work life from your home life. And for a lot of white collar workers, including a lot of lawyers, it's the exact opposite. Now we're taking our work life home for during the pandemic five days a week, seven days a week. And now a lot of us are doing like three, four days a week. How does that play into some of the trade secret issues that you see in your practice?

Tracey Diamond:

Absolutely plays into it, because there's such a blurring now between the personal life and work life, that it's even more challenging for companies to maintain secrecy of important company data, because it's literally being accessed from the home environment. And what I've seen, and then I'm sure you have things to weigh in here too, is companies, to a certain extent, using technology, in terms of making sure that its company laptops. Employees aren't working off their personal laptops, let's say, or personal PCs. Sandboxing off the data.

And providing rules to employees, even in the form of work from home agreements, where the employee is given very specific rules about when and where and how they perform their work while they're at home, that other family members and friends shouldn't have access to the electronic equipment that the work is done in a private space, and that the employers are able to keep track of the time being spent doing the work and the work products, so that they maintain some controls over it.

Evan Gibbs:

I can give up an interesting example that I dealt with for a client. Our client, I won't even name the industry... I won't name the client, won't name the industry, but they do... This particular company does a lot of high-level research and development work. And one of their scientists ended up... We found out he had the same job doing R and D for two direct competitors at the same time and our client was one of them. And so he was working from home and he had two separate systems. He had two separate company laptops. And he was doing basically the exact same job for these two competitors at the same time in like a highly secretive part of the company. And that's the only instance that I've had where somebody was moonlighting for a direct competitor, but it just shows how much is that really happening.

How much is that happening and we just don't know it? Because there's no way... If somebody's fully remote, there's decentralization of time or change expectations in terms of what your hours are when you're actually working. And so if somebody, especially if their time is not really being monitored, this really wouldn't be that hard, I think, some industries to work for two competitors. And so this guy was pretty clever and he really kept the two systems separate and apart.

But we did find some personal emails exchange where there were some questionable materials exchanged, but I think that highlights another issue. How do you monitor stuff like that when you can't see what the employee... because there's no way you could have gotten away with that in person, right? These guys have got two separate laptops, clearly working for another company. That would've been a little hard to get away with.

Tracey Diamond:

I bet you that they could do it from the office too or behind closed doors. You don't know what's going on. Right. It sounds like being married to two different people at the same time. And I tell you, I had a similar situation too, Evan. I do think it is more common than we think.

Tim Londergan:

Quick question, are these work from home agreements, are those pretty commonplace now or?

Tracey Diamond:

They are, particularly... They were common before the pandemic because lots of companies had remote workers before the pandemic and they're much more common now since the pandemic. And I do recommend them to clients work from home agreement as opposed to a policy where an agreement is actually signed by the employee, I think, has more teeth. I'd like to get us back to the show. So, in *Severance*, the way the show handles secrets is not only are employees unable to remember what happens to them during their workday, but they were also given data that has been scrubbed to the point that they don't even know what they're looking at. Let's listen to another clip that describes what they do.

Helly:

Should this mean something to me?

Mark:

No, no. All the data comes from upstairs, fully encoded.

Helly:

Then how do I categorize it? What?

Mark:

Each category of numbers presents in such an order as to elicit an emotional response in the refiner. So, cat one numbers, for example, feel a certain way on site. They'll be sort of disconcerting, scary.

Helly:

Scary?

Mark:

I know.

Helly:

My job is to scroll through this spreadsheet and look for numbers that are scary.

Dylan:

It sounds dumb, and Mark said it dumb.

Helly:

Are the numbers bloody, do they chant?

Mark:

Doesn't make sense until you see it and it takes a while to see.

Tracey Diamond:

Companies in reality obviously don't go to these kinds of extremes because nothing would ever get done. But how does a company strike a balance between giving employees sufficient access to sensitive materials to allow them to develop the company's intellectual property while putting enough safeguards in place to protect the secrecy of such information?

Will Taylor:

I'll just say from a litigation perspective, that one of the important facts you may look at is how widespread the access is to particular information. And if there is a reason to basis for, it's been my experience, that level of access will pass muster, so to speak. Now, you can imagine circumstances where that doesn't make sense. Like if you have a reason basis for a thousand people having access to information within a company, then that probably doesn't make sense. And that reason basis is they all work for the company. But if you had a specific group that had access to that information and could show to a court why that was the case, then I think that shows a forethought in protecting that information. But there is the tension as you bring out, Tracey, that innovate or die is the adage, right?

And how can you do that if you're not letting all your best and brightest have access to information? And then there's reality, right? You're a company, you're growing, you're adding people. You're hopefully if you're developing things quickly, there's a lot of give and take between various innovators at your company. In that circumstance, the last thing you want is a lawyer to walk in the room and say, get Joe and Tommy out of here, because they're not part of the access group. So I think the principle that I have in mind is have some reason basis for a certain group of people having access to this information and stay true to that reason basis.

But you do have to consider a degree of flexibility where if at the end of the day, you protect your trade secrets, but you never actually develop any successful products because you've been too careful about protection, then you've preferably shot yourself in the foot and all the protection of your trade secrets in the world won't benefit you.

Tracey Diamond:

And to add another cliché, I think that's a good example of "penny wise, pound foolish," right?

Will Taylor:

Evan or Tim, no more clichés to add there.

Tim Londergan:

I got nothing. I will add, what I pieced out of the recent case law is "just be proactive," right? I think a lot of what the case law says is just be a little bit proactive and you can argue your way to a successful conclusion. Have a policy, right? Make sure everybody knows there's a policy. Show that you're doing at least some level of documentation. Again, once you get into these innovation workflows where things are complex, if there's 25 people on the project team, that's cool. Just call your trade secrets project XYZ, confidential information, [insider] project XYZ is being treated as corporate trade secret, right? That is infinitely better than doing nothing.

Will Taylor:

Yes. As a starting basis, you've got to make that effort. I will say, I think litigation is a great pressure testing for whether you actually did carry that out. And it isn't enough to have good intentions and have a good policy. You have to follow them. Really, I do see significant advantages in what you were explaining earlier, Tim, of having some accountability in your product to know if you have an NDA, but only one out of 10 people sign it. Well, that NDA is not really going to hold a lot of water and when you go to court to protect your trade secrets.

So if you have a system for making sure that the nine others are chased down and they do sign it, that actually will make a big difference, and even better is I'll call it a paper trail, whatever the equivalent of the electronic paper trail your product would be creating would be a huge advantage at the time of going into court. So, long story short, I think it is important to make those efforts. Something is better than nothing. But over the course of litigation, you really have to show that you did comply with your own policies; inadvertent here and there. You might be able to live through that if you tried otherwise. But the goal is really to have the policies and carry them out.

Evan Gibbs:

Hey, Tim, I'm curious, when you... in terms of just broad strokes, what do you typically find when you start working with a new client or customer? Do you find there's really no systems in place or no formal processes with respect to identifying and securing trade secrets? I'm just curious what you see the folks who come to you.

Tim Londergan:

I'll give you a couple examples from the last few months. One is Fortune 50 company, and they are managing everything by brute force. So an Excel worksheet and a bunch of lawyers, right? So they embed lawyers on project teams and they've got this master Excel file, believe it or not. And all the way to recent inbound lead came in, wanting to see what we were building, because they had already started building a system on top of Salesforce. That's what I would call the best of the best right now, are those customers that are hacking together some kind of solution.

Where we've had a good start, I'd say to the business, is in the biotech life sciences space. So these are what I would refer to as just generally IP sophisticated companies. They know roughly what a trade secret is. They can't talk about case law or details, but they know trade secrets are important. And so they look to us and say, just tell me what to do. And so that's

where we're seeing most of our traction. And a couple of big companies on the hook. So let's see how the next quarter plays out.

Tracey Diamond:

We certainly are looking forward to seeing the growth of the company, for sure. Last question for all of you. If an employer does experience a trade secret breach, how should they handle it from a litigation standpoint? What rights and remedies do they have? It's a pretty big last question.

Evan Gibbs:

Just call us.

Tracey Diamond:

With an easy answer.

Evan Gibbs:

That's fine. That's the easiest answer. But seriously, I think often it's unfortunately you have to run to court. A lot of times you have to run in and get an injunction, a temporary restraining order, go that route. We typically give the other side the heads up and you first go to the opposing party or the person who allegedly took the stuff and ask for it back, is usually a pretty good first step, and figure out whether or not there's a way to get it back without having to file a lawsuit.

Will Taylor:

I'd agree, Evan. I think just to use an example, if an employee goes away with a laptop for whatever reason the company didn't collect it on his way out, or he used his own laptop while he was working at your company, there are some cases where you contact that person and say, ah, how about that laptop back? And it's handed over and you can do the collection from it and make sure everything's protected. Agree that unfortunately sometimes at least the first thing you consider doing is running to court.

You do have to do that initial investigation, right? Whether it's 24 hours or a week. You have to collect your facts and figure out what really happened and what was really taken, because if you go into a court looking for a preliminary injunction, particularly if it's going to interfere with that employee's new employment, you have a high bar. Courts don't want to interfere with an employee's right to travel, so to speak. Tracey and Evan, I think you would know best on exactly what those limitations are.

But in my litigation experience, you have to, if you're going to even broach the topic of enjoining that employee from beginning a new job in a particular role, you better have pretty good facts. So collecting those facts and making sure that they support your concerns and that they would support seeking injunction in state or federal court is probably number one priority. That's of course we're talking about where you're learning of some urgent issue where somebody misappropriated the trade secrets in real time. If you find out about it a year later, the story might be a little bit different. Perhaps you can see that the trade secrets are being used in new products and things like that. That's sort of a different fact analysis, but also one

that you have to have very strong facts, if you think you're going to go into court for an injunction.

Tracey Diamond:

Well, I think on that note, we'll wrap up today. Thank you both, Tim and Will, for being our special guests today on this episode of keeping trade secret secrets and *Severance*. For our listeners, please, stay tuned for more episodes of *Hiring to Firing*, the podcast. Leave us a review, let us know what you think, subscribe to our podcast. And also, don't forget to check out our blog, hiringtoiring.law. Thanks so much.

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