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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO**

DEWAYNE JOHNSON,
Plaintiff,

vs.

MONSANTO COMPANY,
Defendant.

Case No. CGC-16-550128

**DEFENDANT MONSANTO COMPANY'S
REQUEST FOR JUDICIAL NOTICE OF
U.S. ENVIRONMENTAL PROTECTION
AGENCY DOCUMENTS AND FEDERAL
REGISTER MATERIALS**

Trial Date: June 18, 2018
Time: 9:30 a.m.
Department: 504

ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco
06/18/2018
Clerk of the Court
BY: RONNIE OTERO
Deputy Clerk

1 **OVERVIEW:**

2 A large part of Plaintiff Dewayne Johnson's ("Plaintiff") case is that a working group of
3 the International Agency for Research on Cancer ("IARC") based in Lyon, France found, in
4 March 2015, that glyphosate is a probable human carcinogen. The U.S. Environmental Protection
5 Agency ("EPA") has repeatedly reviewed the scientific evidence on glyphosate, before and since
6 the IARC classification, and concluded that it is *not* likely to be carcinogenic in humans. Those
7 agency reviews are memorialized in official documents setting forth the conclusions and
8 describing the processes used to reach them. Monsanto now asks the Court to take judicial notice
9 of a number of those official documents, not for the truth of the matter asserted (e.g., that
10 glyphosate does not cause cancer), but to demonstrate that EPA indeed conducted the reviews
11 described in the official government documents and reached the conclusions the documents set
12 forth.

13 **TO EACH PARTY AND THEIR ATTORNEYS OF RECORD:**

14 You ARE HEREBY NOTIFIED THAT, pursuant to California Evidence Code sections
15 451(b), 452(c), (g) and (h), and 453,¹ Defendant Monsanto Company ("Monsanto") will and
16 hereby does request that this Court take judicial notice of the following EPA official documents
17 and materials from the Federal Register:

18 1. Attached hereto as **Exhibit 1** is a true and correct copy of EPA, Letter from
19 Richard F. Mountfort, Section Head, Fungicide-Herbicides Branch on *Roundup EPA Reg. No.*
20 *524-308 Your Application of May 15, 1974 & September 20, 1974* to Monsanto. (Oct. 18, 1974).

21 2. Attached hereto as **Exhibit 2** is a true and correct copy of EPA, Letter from Robert
22 J. Taylor, Product Manager, Fungicide-Herbicide Branch on *Roundup EPA Reg. No. 524-308 Your*
23 *Application of December 22, 1975* to Monsanto. (Dec. 23, 1975).

24 3. Attached hereto as **Exhibit 3** is a true and correct copy of EPA, *Reregistration*
25 *Eligibility Decision (RED) Glyphosate*, Office of Prevention, Pesticides, and Toxic Substances
26 (1993) [https://www3.epa.gov/pesticides/chem_search/reg_actions/reregistration/red_PC-](https://www3.epa.gov/pesticides/chem_search/reg_actions/reregistration/red_PC-417300_1-Sep-93.pdf)
27 [417300_1-Sep-93.pdf](https://www3.epa.gov/pesticides/chem_search/reg_actions/reregistration/red_PC-417300_1-Sep-93.pdf).

28 ¹ Unless otherwise stated, all citations herein are to the California Evidence Code.

4. Attached hereto as **Exhibit 4** is a true and correct copy of EPA, Memorandum from William Dykstra, Toxicology Branch, Health Effects Division and George Z. Ghali, Science Analysis and Coordination Branch, Health Effects Division *Memorandum on Second Peer Review of Glyphosate* to Robert Taylor, Fungicide-Herbicide Branch, Registration Division and Lois Rossi, Chief, Reregistration Branch, Special Review and Reregistration Division (Oct. 30, 1991) <https://archive.epa.gov/pesticides/chemicalsearch/chemical/foia/web/pdf/103601/103601-265.pdf>.

5. Attached hereto as **Exhibit 5** is a true and correct copy of EPA, Memorandum from William Dykstra, Toxicologist, Registration Action Branch 1 Health Effects Division and Jess Rowland, Executive Secretary, Hazard Identification Assessment Review Committee, Health Effects Division on *Glyphosate – Report of the Hazard Identification Assessment Review Committee*, to Melba Morrow, Branch Senior Scientist, Registration Action Branch 1, Health Effects Division (Apr. 20, 1998) <https://archive.epa.gov/pesticides/chemicalsearch/chemical/foia/web/pdf/103601/103601-1998-04-20a.pdf>.

6. Attached hereto as **Exhibit 6** is a true and correct copy of EPA, *Alkyl Amine Polyalkoxylates (JITF CST 4 Inert Ingredients). Human Health Risk Assessment to Support Proposed Exemption from Requirement of a Tolerance When Used as an Inert Ingredient in Pesticide Formulations*, (April 2009) <https://www.regulations.gov/document?D=EPA-HQ-OPP-2008-0738-0005>.

7. Attached hereto as **Exhibit 7** is a true and correct copy of EPA, *Alkyl Alcohol Alkoxylate Phosphate and Sulfate Derivatives (AAPDs and AASDs – JITF CST 2 Inert Ingredients). Human Health Risk Assessment to Support Proposed Exemption from Requirement of a Tolerance When Used as an Inert Ingredient in Pesticide Formulations*, (June 2009) <https://www.regulations.gov/document?D=EPA-HQ-OPP-2009-0131-0004>.

8. Attached hereto as **Exhibit 8** is a true and correct copy of EPA, *Methyl Poly(Oxyethylene) C8-C18 Alkylammonium Chlorides (MPOACs – JITF CST 7 Inert Ingredients). Human Health Risk Assessment to Support Proposed Exemption from Requirement of a Tolerance*

1 *When Used as an Inert Ingredient in Pesticide Formulations*, (June 2009)

2 <https://www.regulations.gov/document?D=EPA-HQ-OPP-2009-0042-0006>.

3 9. Attached hereto as **Exhibit 9** is a true and correct copy of EPA, *Sodium and*
4 *Ammonium Naphthalenesulfonate Formaldehyde Condensates (SANFCs – JITF CST 11 Inert*
5 *Ingredients). Human Health Risk Assessment to Support Proposed Exemption from Requirement*
6 *of a Tolerance When Used as an Inert Ingredient in Pesticide Formulations*, (May 2009)

7 <https://www.regulations.gov/document?D=EPA-HQ-OPP-2009-0490-0002>.

8 10. Attached hereto as **Exhibit 10** is a true and correct copy of EPA, *Alkyl Alcohol*
9 *Alkoxylates (AAA – JITF CST 1 Inert Ingredient). Human Health Risk Assessment to Support*
10 *Proposed Exemption from Requirement of a Tolerance When Used as an Inert Ingredient in*
11 *Pesticide Formulations*, (July 2009) [https://www.regulations.gov/document?D=EPA-HQ-OPP-](https://www.regulations.gov/document?D=EPA-HQ-OPP-2009-0145-0004)

12 [2009-0145-0004](https://www.regulations.gov/document?D=EPA-HQ-OPP-2009-0145-0004).

13 11. Attached hereto as **Exhibit 11** is a true and correct copy of EPA, Memorandum
14 from Monique M. Perron, Sc.D., Toxicologist et al., on *Glyphosate. Draft Human Health Risk*
15 *Assessment in Support of Registration Review* to Caitlin Newcamp, Chemical Review Manager
16 and Neil Anderson, Branch Chief, Pesticide Reevaluation Division (PRD; 7508P) (Dec. 12, 2017)

17 <https://www.regulations.gov/document?D=EPA-HQ-OPP-2009-0361-0068>.

18 12. Attached hereto as **Exhibit 12** is a true and correct copy of EPA, Cancer
19 Assessment Review Committee, Health Effects Division, Office of Pesticide Programs, U.S.
20 Environmental Protection Agency, *Cancer Assessment Document – Evaluation of the*
21 *Carcinogenic Potential of Glyphosate* (Oct. 1, 2015)

22 <https://www.regulations.gov/document?D=EPA-HQ-OPP-2016-0385-0014>.

23 13. Attached hereto as **Exhibit 13** is a true and correct copy of EPA, Office of
24 Pesticide Programs, *Glyphosate Issue Paper: Evaluation of Carcinogenic Potential*,
25 Regulations.gov (Sept. 12, 2016) [https://www.epa.gov/sites/production/files/2016-](https://www.epa.gov/sites/production/files/2016-09/documents/glyphosate_issue_paper_evaluation_of_carcinogenic_potential.pdf)
26 [09/documents/glyphosate_issue_paper_evaluation_of_carcinogenic_potential.pdf](https://www.epa.gov/sites/production/files/2016-09/documents/glyphosate_issue_paper_evaluation_of_carcinogenic_potential.pdf).

27 14. Attached hereto as **Exhibit 14** is a true and correct copy of EPA, Office of
28 Pesticide Programs, *Revised Glyphosate Issue Paper: Evaluation of Carcinogenic Potential*,

1 EPA.gov (Dec. 12, 2017), <https://www.epa.gov/sites/production/files/2017->

2 [12/documents/revised_glyphosate_issue_paper_evaluation_of_carcinogenic_potential.pdf](https://www.epa.gov/sites/production/files/2017-12/documents/revised_glyphosate_issue_paper_evaluation_of_carcinogenic_potential.pdf).

3 15. Attached hereto as **Exhibit 15** is a true and correct copy of Testimony of Anna B.
4 Lowit, Science Advisor, OPP, EPA: Before the H. Comm. on Sci., Space, and Tech., 115th Cong.
5 (Feb. 6, 2018), [http://docs.house.gov/meetings/SY/SY00/20180206/106828/HHRG-115-SY00-](http://docs.house.gov/meetings/SY/SY00/20180206/106828/HHRG-115-SY00-Wstate-LowitA-20180206.pdf)
6 [Wstate-LowitA-20180206.pdf](http://docs.house.gov/meetings/SY/SY00/20180206/106828/HHRG-115-SY00-Wstate-LowitA-20180206.pdf).

7 16. Attached hereto as **Exhibit 16** is a true and correct copy of the March 10, 1992
8 U.S. EPA Approval Letter with approved Monsanto glyphosate-based herbicide (“GBH”) product
9 labeling, https://www3.epa.gov/pesticides/chem_search/ppls/000524-00452-19920310.pdf.

10 17. Attached hereto as **Exhibit 17** is a true and correct copy of the Nov. 20, 2002 U.S.
11 EPA Approval Letter with approved Monsanto GBH product labeling,
12 https://www3.epa.gov/pesticides/chem_search/ppls/000524-00517-20021120.pdf.

13 18. Attached hereto as **Exhibit 18** is a true and correct copy of the March 8, 2006 U.S.
14 EPA Approval Letter with approved Monsanto GBH product labeling,
15 https://www3.epa.gov/pesticides/chem_search/ppls/000524-00529-20060308.pdf.

16 19. Attached hereto as **Exhibit 19** is a true and correct copy of the July 1, 2009 U.S.
17 EPA Approval Letter with approved Monsanto GBH product labeling,
18 https://www3.epa.gov/pesticides/chem_search/ppls/000524-00579-20090701.pdf.

19 20. Attached hereto as **Exhibit 20** is a true and correct copy of the Jan. 25, 2010 U.S.
20 EPA Approval Letter with approved Monsanto GBH product labeling,
21 https://www3.epa.gov/pesticides/chem_search/ppls/000524-00517-20100125.pdf.

22 21. Attached hereto as **Exhibit 21** is a true and correct copy of the March 10, 2016
23 U.S. EPA Approval Letter with approved Monsanto GBH product labeling,
24 https://www3.epa.gov/pesticides/chem_search/ppls/071995-00051-20160310.pdf.

25 22. Attached hereto as **Exhibit 22** is a true and correct copy of Glyphosate; Pesticide
26 Tolerances, 62 Fed. Reg. 17,723 (Apr. 11, 1997) (to be codified in 40 C.F.R. pts. 180, 185, & 186)
27 <https://www.gpo.gov/fdsys/pkg/FR-1997-04-11/pdf/97-9231.pdf>.

28 23. Attached hereto as **Exhibit 23** is a true and correct copy of Glyphosate; Pesticide

1 Tolerances, 64 Fed. Reg. 66,108 (Nov. 24, 1999) (to be codified in 40 C.F.R. pt. 180)

2 <https://www.gpo.gov/fdsys/pkg/FR-1999-11-24/pdf/FR-1999-11-24.pdf>.

3 24. Attached hereto as **Exhibit 24** is a true and correct copy of Glyphosate; Pesticide

4 Tolerances, 67 Fed. Reg. 60,934 (Sept. 27, 2002) (to be codified in 40 C.F.R. pt. 180)

5 <https://www.gpo.gov/fdsys/pkg/FR-2002-09-27/pdf/02-24488.pdf>.

6 25. Attached hereto as **Exhibit 25** is a true and correct copy of Glyphosate; Pesticide

7 Tolerances, 69 Fed. Reg. 65,081 (Nov. 10, 2004) (to be codified in 40 C.F.R. pt. 180)

8 <https://www.gpo.gov/fdsys/pkg/FR-2004-11-10/pdf/04-25098.pdf>.

9 26. Attached hereto as **Exhibit 26** is a true and correct copy of Glyphosate; Pesticide

10 Tolerances, 73 Fed. Reg. 73,586 (Dec. 3, 2008) (to be codified in 40 C.F.R. pt. 180)

11 <https://www.gpo.gov/fdsys/pkg/FR-2008-12-03/pdf/E8-28571.pdf>.

12 27. Attached hereto as **Exhibit 27** is a true and correct copy of experts of Alkyl Amine

13 Polyalkoxylates; Exemption from the Requirement of a Tolerance, 74 Fed. Reg. 28,616 (June 17,

14 2009) (“Surfactant Cluster 4”) <https://www.gpo.gov/fdsys/pkg/FR-2009-06-17/pdf/E9-14113.pdf>.

15 28. Attached hereto as **Exhibit 28** is a true and correct copy of experts of Alkyl

16 Alcohol Alkoxylate Phosphate and Sulfate Derivatives; Exemption From the Requirement of a

17 Tolerance, 74 Fed. Reg. 37,571 (July 29, 2009) (“Surfactant Cluster 2”)

18 <https://www.gpo.gov/fdsys/pkg/FR-2009-07-29/pdf/E9-18033.pdf>.

19 29. Attached hereto as **Exhibit 29** is a true and correct copy of experts of Methyl

20 Poly(Oxyethylene)C8–C18 Alkylammonium Chlorides; Exemption from the Requirement of a

21 Tolerance, 74 Fed. Reg. 38,956 (Aug. 5, 2009) (“Surfactant Cluster 7”)

22 <https://www.gpo.gov/fdsys/pkg/FR-2009-08-05/pdf/E9-18348.pdf>.

23 30. Attached hereto as **Exhibit 30** is a true and correct copy of experts of Alkyl

24 Alcohol Alkoxylates; Exemption from the Requirement of a Tolerance, 74 Fed. Reg. 38,935 (Aug.

25 5, 2009) (“Surfactant Cluster 1”) <https://www.gpo.gov/fdsys/pkg/FR-2009-08-05/pdf/E9->

26 [18706.pdf](https://www.gpo.gov/fdsys/pkg/FR-2009-08-05/pdf/E9-18706.pdf).

27 31. Attached hereto as **Exhibit 31** is a true and correct copy of experts of Sodium and

28 Ammonium Naphthalenesulfonate Formaldehyde Condensates; Exemption from the Requirement

1 of a Tolerance, 74 Fed. Reg. 51,470 (Oct. 7, 2009) (“Surfactant Cluster 11”)

2 <https://www.gpo.gov/fdsys/pkg/FR-2009-10-07/pdf/E9-24160.pdf>.

3 32. Attached hereto as **Exhibit 32** is a true and correct copy of Glyphosate; Pesticide
4 Tolerances, 78 Fed. Reg. 25,396 (May 1, 2013) (to be codified in 40 C.F.R. pt. 180)

5 <https://www.gpo.gov/fdsys/pkg/FR-2013-05-01/pdf/2013-10316.pdf>.

6 **I. JUDICIAL NOTICE IS APPROPRIATE UNDER SECTIONS 451(b), 452(c), (g)**
7 **AND (h)**

8 Monsanto respectfully requests that this Court take judicial notice of the above-described
9 documents for purposes at trial under Evidence Code sections 451(b), 452(c), (g) and (h), and 453.
10 True and correct copies of each have been lodged with the Court.

11 Monsanto previously requested judicial notice of Exhibits 3-4, 12-14, 15, 22, 24-26, and
12 32 related to parties’ motions for summary adjudication or judgment, which Plaintiff Dewayne
13 Johnson (“Plaintiff”) did not oppose. *See* 3/16/2018 Monsanto’s RJN In Support of Motion for
14 Summary Judgment; *see* 4/4/2018 Monsanto’s RJN In Support of Opp’n to Plaintiff’s Motion for
15 Summary Adjudication. The Court granted judicial notice of all of Monsanto’s requests for
16 purposes of those motions. *See* 5/17/2018 Order on *Sargon* and Summary Judgment at 1:23-2:7.
17 Now, Monsanto again seeks judicial notice of the same or similar documents for purposes at trial.

18 **A. Exhibits 1-21 are judicially noticeable under Section 452(c), (g), and (h)**

19 Exhibits 1-21 are proper for judicial notice as official records of the EPA, and because they
20 constitute facts and propositions that are of common knowledge within the territorial jurisdiction
21 of the Court, and facts and propositions so universally known that they cannot reasonably be the
22 subject of dispute. *See* Cal. Evid. Code §§ 452(c), (g), and (h).

23 Evidence Code section 452, subdivision (c) permits the Court to take judicial notice of
24 “[o]fficial acts of the legislative, executive, and judicial departments of the United States.”
25 Official acts include agency records, reports, orders, and testimony made at public legislative
26 hearings. *See Rodas v. Spiegel*, 87 Cal. App. 4th 513, 518 (2001) (taking judicial notice of a
27 decision and order of the California Department of Consumer Affairs and holding, “[o]fficial acts
28 include records, reports and orders of administrative agencies”); *Post v. Prati*, 90 Cal. App. 3d

1 626, 634 (1979) (affirming the trial court’s decision to take judicial notice of, *inter alia*, excerpts
2 of testimony given at legislative hearings under subdivision (c) of Evidence Code section 452).

3 Evidence Code section 452, subdivision (g) permits the Court to take judicial notice of
4 “[f]acts and propositions that are of such common knowledge within the territorial jurisdiction of
5 the court that they cannot reasonably be the subject of dispute.” Cal. Evid. Code § 452(g). The
6 fact need not be physically present within a court’s jurisdiction, but rather, “common knowledge
7 of the fact must exist within the court’s territorial jurisdiction.” Cal. Evid. Code § 452(g),
8 Comment–Assembly Committee on Judiciary. Similarly, subdivision (h) allows judicial notice of
9 “[f]acts and propositions that are not reasonably subject to dispute and are capable of immediate
10 and accurate determination by resort to sources of reasonably indisputable accuracy.” Cal. Evid.
11 Code § 452(h). This includes facts that “are immediately ascertainable by reference to sources of
12 reasonably indisputable accuracy.” Cal. Evid. Code § 452(h), Comment–Assembly Committee on
13 Judiciary.

14 In determining whether judicial notice is appropriate, the Court may rely on “any source of
15 pertinent information” and “advice of persons learned in the subject matter.” Cal. Evid. Code §
16 454. Evidence Code section 453 makes judicial notice of the matters specified in section 452
17 mandatory when, like here, sufficient notice is provided to adverse parties and when sufficient
18 information is furnished to the Court. *See* Cal. Evid. Code § 453.

19 Monsanto requests that the Court take judicial notice of Exhibits 1-21, all of which
20 constitute official acts of the EPA, under Evidence Code sections 452(c), (g), and (h). Exhibits 1-
21 3 include EPA decision and guidance documents, officially approving labeling for Monsanto
22 glyphosate-based herbicide (“GHB”) products. Exhibits 4-14 include EPA’s agency reports on
23 glyphosate such as the Second Peer Review of Glyphosate (Exhibit 4), Report of the Hazard
24 Identification Assessment Review Committee (Exhibit 5), Human Health Risk Assessments
25 (Exhibits 6-11), and EPA Issue Papers (Exhibits 12-14). Exhibit 15 is Congressional testimony
26 made by the EPA before the House Committee on Science, Space, and Technology.² Exhibits 16-
27 _____

28 ² The authenticity of Exhibit 15 is certified in the Affidavit and Sworn Report of Sylvia D. Hall-
Ellis, Ph.D., at ¶ 63 (June 14, 2018).

21 include EPA product labeling approval letters. All Exhibits are available on the EPA websites (as shown by the website links cited above) or otherwise publicly available.

These agency records, reports, and orders are “official acts” of which a court should take judicial notice. *See* Cal. Evid. Code §§ 452(c), 453; *Rodas*, 87 Cal. App. 4th at 518; *Post*, 90 Cal. App. 3d at 634 (1979) (taking judicial notice of congressional testimony); *Gallagher v. Boller*, 231 Cal. App. 2d 482, 489 (1964) (taking judicial notice of agency “guide book”); *In re H.C.*, 17 Cal. App. 5th 1261, 1268 n.4 (2017) (taking judicial notice of a portion of the Child Welfare Policy Manual); *Stevens v. Super. Ct.*, 75 Cal. App. 4th 594, 608 (1999) (taking judicial notice of California Department of Insurance’s letters). The documents are also proper for judicial notice because they contain facts and propositions of common knowledge within the territorial jurisdiction of the Court and so universally known that they cannot reasonably be the subject of dispute. Cal. Evid. Code §§ 452(g) and (h).

B. Exhibits 22-32 Are Judicially Noticeable as Federal Register Materials

Monsanto requests judicial notice of Exhibits 22-32, all of which are materials published in the Federal Register.

Under California Evidence Code section 451(b), the Court must take judicial notice of “[a]ny matter made a subject of judicial notice by . . . Section 1507 of Title 44 of the United States Code.” Cal. Evid. Code § 451(b). That federal statute mandates that materials in the Federal Register be judicially noticed. 44 U.S.C. § 1507 (“The contents of the Federal Register shall be judicially noticed . . .”).

Accordingly, the Court must take judicial notice of these Federal Register materials. *See Black v. Fin. Freedom Senior Funding Corp.*, 92 Cal. App. 4th 917, 934 n.13 (2001) (granting in part party’s request for judicial notice of Federal Register materials).

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1 **II. CONCLUSION**

2 For the foregoing reasons, Monsanto requests that the Court take judicial notice of
3 Exhibits 1-32, including the EPA official documents and the materials from the Federal Register,
4 for purposes of trial.

5
6 Dated: June 18, 2018

Respectfully submitted,

7 FARELLA BRAUN + MARTEL LLP

8
9 By:



10 Sandra A. Edwards

11 Attorneys for Defendant
12 MONSANTO COMPANY
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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of June, 2018, I electronically filed the foregoing **DEFENDANT MONSANTO COMPANY'S REQUEST FOR JUDICIAL NOTICE OF U.S. ENVIRONMENTAL PROTECTION AGENCY DOCUMENTS AND FEDERAL REGISTER MATERIALS (including Exhibits 1 through 32)** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Curtis G. Hoke, Esq.
The Miller Firm, LLC
108 Railroad Avenue
Orange, VA 22960


Susan C. Hunt