**CHISHOLM CHISHOLM & KILPATRICK LLP**
**321 S Main St. #200**
**Providence, Rhode Island 02903**
**(401) 331-6300**
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May 8, 2020

Gregory O. Block, Clerk of the Court
U.S. Court of Appeals for Veterans Claims
Suite 900
625 Indiana Ave., N.W.
Washington, DC 20004

Re: *Adams v. Wilkie*, No. 18-2049

Dear Sir:

In accordance with the duty to keep the Court informed of any developments which could deprive the Court of jurisdiction or "otherwise affect its decision," *see Solze v. Shinseki*, 26 Vet.App. 299, 301 (2013) (citations omitted), counsel for Mr. Adams wishes to notify the Court that he has filed a Substantive Appeal with the March 5, 2020 Statement of the Case that denied an increased rating for his left knee and TDIU. *See* Attachment.

Respectfully submitted,

*/s/ Christian McTarnaghan*
Counsel for Appellant

***VIA CM/ECF SYSTEM***

# CHISHOLM CHISHOLM & KILPATRICK LTD

ATTORNEYS AT LAW

**PLEASE UPLOAD AS ONE DOCUMENT AND LABEL AS VA 9 APPEAL**

Fax Cover Sheet

DATE: April 10, 2020

FROM: Chisholm Chisholm & Kilpatrick LTD

TO: Evidence Intake Center

FAX: 844-531-7818

RE: Marvin Adams
C [redacted]

Number of pages (including cover sheet): 10

MESSAGE: Please see the attached document(s).



IF PROBLEMS ARE ENCOUNTERED IN RECEIVING THIS TRANSMISSION, PLEASE CALL (401) 331-6300.

# CHISHOLM CHISHOLM & KILPATRICK LTD

ATTORNEYS AT LAW

April 10, 2020

Department of Veterans Affairs
Evidence Intake Center
P.O. Box 4444
Janesville, WI 53547

RE: Marvin Adams
C [redacted]

To Whom It May Concern:

Mr. Adams disagrees with the Statement of the Case (SOC) dated March 5, 2020 and is filing this **Substantive Appeal**. He is continuing to seek increased ratings for his left chondromalacia patella, posttraumatic with instability and posttraumatic arthritis of the left knee, to include entitlement to a total disability rating based on individual unemployability (TDIU).

As argued below, Mr. Adams's request for entitlement to TDIU dates back to June 8, 2010, the date he filed his claim for an increased rating for his right knee condition because he notified VA during the appeal of that claim that he was not able to work due to his service-connected knee disabilities. As explained by the only competent, vocational evidence on this issue, Mr. Adams has not able to secure and follow substantially gainful employment since then because his service-connected knee disabilities prevent him from performing essential functions of even sedentary work (the least physically demanding type of work) including sitting for at least 2/3 of an 8-hour day and walking or standing for at least 1/3 of an 8-hour day. The Board has the authority to grant entitlement to TDIU without a referral to the Director of Compensation and the Veteran asks that it do so.

He does not want a hearing in this matter.

## I. Mr. Adams' appeal for entitlement to TDIU dates back to June 8, 2010.

Mr. Adams submitted a claim for an increased rating for his service-connected right knee condition on June 8, 2010. VA denied Mr. Adams' claim in a Rating Decision in October 2010. He filed a timely Notice of Disagreement in October 2011, and VA issued a SOC in June 2012. In response, he submitted a VA 9 appeal in June 2012 and a Supplemental Statement of the Case (SSOC) was issued in December 2012. His file was then sent to the Board of Veterans' Appeals (Board) and a Board Decision was issued in December 2014 awarding a 20-percent rating, but no higher, for his

right knee condition. Mr. Adams appealed the December 2014 Board Decision to the Court of Appeals for Veterans Claims (Court) and a Joint Motion for Partial Remand was filed on September 17, 2015 and the Court granted it on September 23, 205 vacating and remanding the December 2014 Board Decision. In December 22, 2015 the Board awarded a separate disability rating for Mr. Adams' right knee instability and remanding an increased rating for his right knee condition. A SSOC was issued on April 4, 2016 and his file was returned to the Board.

The Board denied Mr. Adams' appeal for an increased rating on August 4, 2016. Mr. Adams appealed the August 2016 Board Decision to Court, and again entered into a Joint Motion for Remand. Once back at the Board, Mr. Adams submitted argument on February 26, 2018 for an increased rating and entitlement to TDIU. **A request for TDIU is not a new claim for benefits, but rather part and parcel of the Veteran's increased rating claim on appeal.** *See Rice v. Shinseki*, 22 Vet.App. 447 (2009); *see also AB v. Brown*, 6 Vet.App. 35, 38 (1993); VA Fast Letter 13-13 ("As a result of *Rice v. Shinseki* (2009), TDIU claims are no longer adjudicated as freestanding claims. A TDIU claim may be expressly claimed in conjunction with an original service-connection claim, or with a claim for increased evaluation.") (FL 13-13 is now incorporated into the M21-1 at Part IV, Subpart ii, Chapter 2, Section F, Topic 2.j). However, the Board Decision dated April 9, 2018 referred entitlement to TDIU to the Agency of Original Jurisdiction (AOJ). Believing that the Board should have address his entitlement to TDIU on the merits in its 2018 decision, Mr. Adams appealed thatdecision to Court where that matter is still pending.

TDIU is not a free-standing claim, but rather part and parcel of an increased rating claim. *Rice*, 22 Vet.App. 447. Thus, Mr. Adams's appeal for an increased rating also encompassed entitlement to TDIU. *See AB v. Brown*, 6 Vet.App. 35, 38 (1993) (holding a Veteran is presumed to be seeking the highest rating possible.). "Once the Board has jurisdiction over a claim, . . . it has the authority to address *all issues* related to that claim." *Jarrell v. Nicholson*, 20 Vet.App. 326, 332 (2006). Further, VA's own policy reflects that the Secretary will comply with *Rice* in adjudicating the issue of TDIU in connection with increased rating claims. (FL 13-13 is now incorporated into the M21-1 at Part IV, Subpart ii, Chapter 2, Section F, Topic 2.j). The M21 makes clear that when a veteran files an NOD relative to a claim for an increased evaluation and while the appeal is pending the Veteran claims TDIU due, at least in part, to the disability on appeal, the issue is still part of the pending appeal. Therefore, the issue of TDIU has been in appellate status since June 2010. The Court has held that an appeal to the Board of the issue of an appropriate disability evaluation includes the issue of entitlement to TDIU for the entire appeal period. *See Harper v. Wilkie*, 30 Vet.App. 356, 361-62 (2018). In *Harper*, the Court clarified that the grant of TDIU during the pendency of an appeal does not bifurcate the issue of TDIU from an appeal as to an appropriate evaluation; instead, it serves as only a partial grant. *Id*. The Court further held that the Board has jurisdiction to consider the issue of TDIU as part of the appeal of the issue of the appropriate disability evaluation even if a separate NOD as to the TDIU effective date has not been filed. *Id*.

**II. Mr. Adams is unable to secure and follow a substantially gainful occupation due to his**

# Substantive Appeal

**service-connected conditions.**

The Veteran is service connected for degenerative disease of the right knee; left chondromalacia patella, posttraumatic with instability; posttraumatic arthritis of the left knee; and right knee instability. His combined rating is 50percent from June 8, 2010.

Although the Veteran does not meet the schedular requirements for TDIU, the law states that "all veterans who are unable to secure and follow a substantially gainful occupation by reason of service-connected disabilities shall be rated totally disabled." 38 C.F.R. § 4.16(b) (2019). In rendering its decision, the Board does *not* need to refer the issue of TDIU under 4.16(b) to the Director. The Court majority in *Wages v. McDonald* noted that "[i]n sum, the Secretary's contention that § 4.16(b) vests an extraschedular TDIU award solely within the non-reviewable discretion of the Director *conflicts with the statutory mandate that the Board provide the final decisions on section 511(a) benefits determinations.* Accordingly, this contention is rejected." 27 Vet.App. at 238; *see also Floyd v. Brown*, 9 Vet.App. 88, 103 (1999) (Steinberg J., dissenting) (stating to require the Board to refer extraschedular evaluation to the Director of Compensation Services conflicts with the statutory delineation of the Board's authority in 38 U.S.C. § 7104, which obligates the Board to render a decision on all applicable provisions of law and to review all questions in a matter before it).

In further support, the Veteran refers to other Board decisions as persuasive authority on this point:

> The Board finds that *Bowling* and *Floyd's* prohibition against granting an extraschedular TDIU in the first instance has been implicitly overruled through the issuance of the Court's decisions in *Thun* and *Anderson*, as well as the Federal Circuit's affirmance of *Thun* and its decisions in *Disabled Am. Veterans v. Sec'y of Veterans Affairs*, 327 F.3d 1339 (Fed. Cir. 2003) and *Johnson v. McDonald*, 762 F.3d 1362 (Fed. Cir. 2014). It simply defies logic and the intent of the law that the Board is able to review de novo the determinations of the Director of Compensation, yet must send it to him in the first instance, even when the Board finds that the evidence of record already shows the Veteran is incapable of obtaining or engaging in substantially gainful employment.

Docket No. 08-24 228, 2015 WL 9696192, at *2 (Nov. 9, 2015); Docket No. 10-43 019, 2015 WL 2161965, at *10 (Bd. Vet. App. Mar. 23, 2015). Both Veterans Law Judges in these cases correctly assessed that the Board had jurisdiction to adjudicate the issue of TDIU in the first instance. Moreover, under the AMA, the Board may only remand for correction of a duty to assist error and for correction of any other error by the agency of original jurisdiction. Therefore, there is no basis under the AMA for remand for referral to the Director of Compensation under 38 C.F.R. § 4.16 (b).

Additionally, although the Board generally does not assign an extraschedular evaluation in the first instance under 38 C.F.R. § 4.16(b), 38 C.F.R. § 4.16(b) merely states that the rating boards "should"

refer to the Director of Compensation Services for extraschedular consideration all cases where the Veteran is unable to secure or follow a substantially gainful occupation by reason of service-connected disability. As such, the term "should" is permissive, not mandatory, and the Board can choose to proceed without a referral, especially if there is no prejudice to the Veteran. *See Jarrell v. Nicholson*, 20 Vet.App. 326, 332 (2006) (The Board may exercise authority with regard to questions or issues not previously addressed by an AOJ in the first instance if it determines that there would be no prejudice to the claimant); *see also Scott v. McDonald*, 789 F.3rd 1375 (Fed. Cir. 2015); *Bernard v. Brown*, 4 Vet.App. 384, 392 (1993). Therefore, this case turns to whether the Veteran is unable to secure and follow substantially gainful employment due to his service-connected disabilities.

In *Ray v. Wilkie*, the Court determined that VA had "refused to provide an adequate definition" for the term "substantially gainful employment" in 38 C.F.R. § 4.16, despite repeatedly being encouraged to do so over the course of almost three decades. 31 Vet.App. 58, 69 (2019). To that end, the Court interpreted the phrase "substantially gainful employment" to include (1) an economic component and (2) a non-economic component. *Id*. at 73. Not only must VA consider whether an occupation produces more than marginal income, it must also assess whether the veteran is "*capable* of performing the physical and mental acts required by employment." *Id*. (quoting *Van Hoose v. Brown*, 4 Vet.App. 361, 636 (1993) (emphasis in original)).

With regard to the economic component, in Mr. Adams' November 2017 VA Form 21-8940, he reported he last worked full-time in approximately 2003, when he retired from his long-time employment with the U.S. Postal Service (USPS) due to his worsening knee disabilities. Although the Veteran reported maintaining part-time work from 2003 to 2009, his earnings record, previously submitted on February 26, 2018, shows that his employment after leaving USPS never resulted in more than marginal earnings. The applicable regulation states "marginal employment generally shall be deemed to exist when a veteran's earned annual income does not exceed the amount established by the U.S. Department of Commerce, Bureau of the Census, as the poverty threshold for one person." 38 C.F.R. § 4.16(a). Mr. Adams' earnings record further shows no earnings at all since 2009. Therefore, the evidence establishes that the Veteran has not worked in any gainful capacity since 2003.

The question then becomes whether the Veteran's unemployability is attributable to the functional limitations imposed by his service-connected disabilities. With regard to those functional limitations, the Court held that VA is required to consider (1) "the veteran's history, education, skill, and training," (2) "whether the veteran has the physical ability (both exertional and non-exertional) to perform the type of activities (e.g., sedentary, light, medium, heavy, or very heavy) required by the occupation at issue," and (3) "whether the veteran has the mental ability to perform the activities required by the occupation at issue." *Ray*, 31 Vet.App. at 73.

In order to assist VA in its evaluation of the factors outlined by the Court in *Ray*, Mr. Adams submitted a vocational employability assessment dated January 8, 2018 from Robin D. Giese, CRC.

## Substantive Appeal

After a complete review of the claims file and an interview with the Veteran, Mr. Giese opined that "it is more likely than not that he is unable to secure and follow a substantially gainful occupation, to include sedentary employment, since he stopped working as a bulk mail technician in 2003." *See* Giese vocational assessment p. 8.

With regard to the Veteran's vocational history, education, skills and training, Mr. Giese found Mr. Adams' educational background includes a high school degree and two years of general education at the college level. *See* Giese vocational assessment p. 6. Mr. Giese further reported:

> He has worked as a postal clerk, a security guard, a mail sorter, in customer service, in a 90-day trial assignment as a postmaster and as a bulk mail technician. His vocational background, partnered with his lack of computer and keyboarding skills, does not provide him sufficient skills for sedentary occupations.

*See* Giese vocational assessment pp. 6-7. With regard to the Veteran's physical limitations, VA is required to consider, among other things, "lifting, bending, sitting, standing, walking, climbing, grasping, typing, and reaching, as well as auditory and visual limitations." *Ray*, 31 Vet.App. at 73. The expert opined that:

> Mr. Adams reports that as a result of his symptoms, he cannot sit in a static position for more than 30 minutes before he must stand up and move around for approximately 10-15 minutes; he is unable to sustain sitting during the course of an 8-hour work day even with hourly rest breaks; he cannot stand for more than 30 minutes before he must sit down to rest; he cannot walk more than 20 minutes before he must sit down with the use of knee braces; he is unable to lift or carry more than 10 pounds; he is unable to squat, crouch or crawl; and, he is limited in his ability to drive distances or to get in and out of a motor vehicle.

*See* Giese vocational assessment p. 5. This finding, as discussed below, is also supported by the evidence of record. Mr. Giese further opined:

> Mr. Adams' residual functional capacity because of his service-connected knee condition symptoms is determined to be less than what his required for sedentary work. Specifically, he is unable to sustain frequent to constant sitting (66%-100% of an 8-hour workday); he is unable to sustain the occasional standing and walking (33% of an 8-hour workday); and, he is unable to sustain sitting, standing or walking over the course of an 8-hour workday. As Dr. Anderson documents in the 04.21.2008 Knees C&P Examination: Mr. Adams' bilateral knee pain is present especially while sitting and that he is occupationally limited in the amount of standing, kneeling and jogging that he can perform due to the degenerative joint disease in both of Mr. Adams' knees.

## Substantive Appeal

> The combination of Mr. Adams' right and left knee service connected conditions combine to create a disability which is greater than any of these disabilities would separately cause. Specifically, these service-connected conditions result in Mr. Adams having less than a sedentary residual functional capacity and impact his ability to meet or sustain production demands required in a competitive work environment.

*See* Giese vocational assessment p. 7. While VA does not define the term "sedentary," the *Dictionary of Occupational Titles* (DOT), which is "based on information obtained from the U.S. Department of Labor, the U.S. Census Bureau, and other reliable sources," does. The DOT's listing of jobs has been replaced by O*Net,[1] but its definitions of the exertional demand of work remain valid. O*Net, though, is a database, not a dictionary, and it focuses on the skills and education necessary for approximately 1000 different careers.[2] The DOT definition of the exertional levels of work, therefore, has not been replaced. Its definitions of the exertional demands of work therefore remain valid. *See* 20 C.F.R. § 404.1567 (2019). Its authoritative definition of sedentary work requires "sitting most of the time, but may involve walking or standing . . . occasionally," which the DOT defines as up to 1/3 of an eight-hour work day (*i.e.*, 2 2/3 hours). http://www.occupationalinfo.com/appendxc_1.html (last viewed April 6, 2020). Further, *Ray* used SSA definition of sedentary which in turn incorporates DOT definition. *See Ray* at 73, relying on 20 C.F.R. § 20.1567 (which defines physical exertion requirements of work, and not that those "terms have the same meaning as they have in the Dictionary of Occupational Titles."). Given the Veteran's severe physical limitations involving sitting, standing, or walking, he would be unable to perform physical or sedentary employment.

The expert's vocational opinion is thoroughly adequate and highly probative because it is founded on a complete review of the claims file and on an interview of the Veteran, and it is supported by the particular facts of the medical history. *See Nieves-Rodriguez v. Peake*, 22 Vet.App. 295, 301-02 (2008). Mr. Giese is competent and qualified as an expert to review the physical and non-physical limitations caused by disabilities and translate them into whether or not such a degree of restrictions prevents one from an ability to work. *Espiritu v. Derwinski*, 2 Vet.App. 492, 495 (1992) (quoting *Frye v. United States*, 293 F. 1013, 1014 (1923)), *overruled on other grounds by King v. Shinseki*, 700 F.3d 1339, 1345 (Fed. Cir. 2012). This is recognized in Rule 702 of the Federal Rules of Evidence, which requires "scientific, technical, or other specialized knowledge" must be provided by "a witness qualified as an expert by knowledge, skill, experience, training, or education." *Id.* (citing Fed. R. Evid. 702). Lastly, his expert opinion is enhanced by his assessment of the

[1] *See* https://www.bls.gov/soc/socrpt929.pdf; *and see Withers v. Wilkie*, 30 Vet.App. 139 (2018).
[2] *See generally* O*Net, https://www.onetonline.org/ (last accessed April 6, 2020).

Veteran's service-connected disabilities in the aggregate. *Geib v. Shinseki*, 733 F.3d 1350, 1354 (Fed. Cir. 2013); *Floore v. Shinseki*, 26 Vet.App. 376, 382 (2013).

The limitations described by Mr. Giese are also consistent with the other medical evidence of record. The July 31, 2010 VA examination for joints found the Mr. Adams' knees impact his ability to walk and climb stairs. The July 2010 examiner also found "[f]lare ups are primarily activity related and vary in severity and duration with the occasional affect (*sic*) of having to stay off of his feet for varying period of time." *See* July 2010 VA examination pp. 1-2. During the January 25, 2016 VA examination for his knees Mr. Adams reported since 2010 his symptoms have progressed limiting his daily activity. *See* January 2016 VA examination p.2. The examiner further concluded the Veteran would be unable to "bend, climb, etc." due to his knees. *See* January 2016 VA examination p.8. During the February 26, 2016 VA examination for his knees the Veteran reported that both his knees give away, and cause difficulty with sitting, using stairs, standing, and kneeling/bending. *See* February 2016 VA examination pp.2-3. Lastly, the July 26, 2018 examiner found "Veteran would not tolerate employment requiring prolonged weight bearing, climbing, kneeling as these activities exacerbate his knee symptoms." *See* July 2018 VA examination p. 11.

Mr. Adams submitted a VA form 21-8940 addendum dated January 21, 2017 further attesting to the limitations he felt from his knee conditions. He reported that while he was working as a bulk mail technician, he was required to be on his feet for the majority of the workday even though he began to experience pain after standing for only an hour. *Id*. He further reported that he was only able to comfortably lift items weighing five to ten pounds without experiencing knee pain, but that he was still required to routinely lift items weighing more than twenty-five pounds anyway and would have to seek assistance from co-workers. *Id*. Mr. Adams subsequently worked as a part-time baggage checker, but was unable to maintain that employment for more than a year due to his standing limitations. *Id*. Finally, he reported that he was able to maintain his part-time employment from 2006 to 2009 because he was only required to work for part of the day and did not need to stand as frequently. *Id*.

A Veteran is competent to provide lay testimony on matters of which he has personal knowledge, such as experiencing the symptoms of a disability. *See* 38 C.F.R. § 3.159(a)(2) (2019); *Barr v. Nicholson*, 21 Vet.App. 303, 307 (2007).

The Board cannot deny TDIU without producing evidence, as opposed to mere conjecture, that the Veteran can perform work that would produce income that is other than marginal. *Beaty v. Brown*, 6 Vet.App. 532, 537 (1994). In fact, the vocational expert's opinion provides probative evidence that Mr. Adams is unable to secure and follow a substantially gainful occupation, whether it be physical or sedentary employment. *Cf. Pederson v. McDonald*, 27 Vet.App. 276 (2015) (*en banc*). The evidence of record and evidence submitted herein demonstrate that the Veteran has not worked in any capacity since 2009 due to his knee disabilities, and that his employment from 2003 to 2009 was marginal in nature. **Accordingly, the Board should find that he is unable to secure and follow a**

**substantially gainful occupation and grant him entitlement to TDIU for the entire period on appeal.** 38 C.F.R. § 4.16.

Very truly yours,

Robert V. Chisholm
VA POA #00R

/MLD/sd
Enclosure: VA Form 9 Appeal
cc: Marvin Adams

## Substantive Appeal

Form Approved: OMB No. 2900-0674
Expiration Date: Feb. 28, 2022
Respondent Burden: 1 Hour

Department of Veterans Affairs

# APPEAL TO BOARD OF VETERANS' APPEALS

***IMPORTANT:*** *Read the attached instructions before you fill out this form. VA also encourages you to get assistance from your representative in filling out this form.*

| 1. NAME OF VETERAN *(Last Name, First Name, Middle Initial)* | 2. CLAIM FILE NO. *(Include prefix)* | 3. INSURANCE FILE NO., OR LOAN NO. |
|---|---|---|
| Adams Marvin | [redacted] | |

4. I AM THE:

☐ VETERAN ☐ VETERAN'S WIDOW/ER ☐ VETERAN'S CHILD ☐ VETERAN'S PARENT

☑ OTHER *(Specify)*

| 5. TELEPHONE NUMBERS | | 6. MY ADDRESS IS: *(Number & Street or Post Office Box, City, State & ZIP Code)* |
|---|---|---|
| A. HOME *(Include Area Code)* | B. WORK *(Include Area Code)* | 321 S Main St #200<br>Providence, RI 02903 |
| 401-331-6300 | 401-331-6300 | |

7. IF I AM NOT THE VETERAN, MY NAME IS: *(Last Name, First Name, Middle Initial)*

Robert V. Chisholm

8. THESE ARE THE ISSUES I WANT TO APPEAL TO THE BOARD: *(Be sure to read the information about this block in paragraph 6 of the attached instructions.)*

A. ☐ I HAVE READ THE STATEMENT OF THE CASE AND ANY SUPPLEMENTAL STATEMENT OF THE CASE I RECEIVED. I AM **ONLY** APPEALING THESE ISSUES: *(List below.)*

B. ☑ I WANT TO APPEAL **ALL** OF THE ISSUES LISTED ON THE STATEMENT OF THE CASE AND ANY SUPPLEMENTAL STATEMENT OF THE CASE THAT MY LOCAL VA OFFICE SENT TO ME.

9. HERE IS WHY I THINK THAT VA DECIDED MY CASE INCORRECTLY: *(Be sure to read the information about this block in paragraph 6 of the attached instructions.)*

Please see attached letter from representative.

*(Continue on the back, or attach sheets of paper, if you need more space.)*

10. **OPTIONAL** BOARD HEARING

***IMPORTANT:*** *Read the information about this block in paragraph 6 of the attached instructions. This block is used to request an optional Board of Veterans' Appeals (Board) hearing. DO NOT USE THIS FORM TO REQUEST A HEARING BEFORE VA REGIONAL OFFICE PERSONNEL.*
*Check one (and only one) of the following boxes*

A. ☑ I DO NOT WANT AN OPTIONAL BOARD HEARING. *(Choosing this option often results in the Board issuing its decision most quickly. If you choose, you may write down what you would say at a hearing and submit it directly to the Board.)*

I WANT AN OPTIONAL BOARD HEARING:

B. ☐ BY LIVE VIDEOCONFERENCE AT A LOCAL VA OFFICE. *(Choosing this option will add delay to issuance of a Board decision.)*

C. ☐ IN WASHINGTON, DC. *(Choosing this option will add delay to issuance of a Board decision.)*

D. ☐ AT A LOCAL VA OFFICE.* *(Choosing this option will add **significant** delay to issuance of a Board decision.)*
**This option is not available at the Washington, DC, or Baltimore, MD, Regional Offices.*

| 11. SIGNATURE OF PERSON MAKING THIS APPEAL *(Ink signature required)* | 12. DATE *(MM/DD/YYYY)* | 13. SIGNATURE OF APPOINTED REPRESENTATIVE, IF ANY *(Not required if signed by appellant. See paragraph 6 of the instructions.) (Ink signature)* | 14. DATE *(MM/DD/YYYY)* |
|---|---|---|---|
| | | | 04/10/2020 |