

**IN THE CIRCUIT COURT OF THE 17th JUDICIAL CIRCUIT
CASS COUNTY, MISSOURI**

MELANIE A. ANDERSON,)	
)	
Plaintiff,)	
-vs-)	Case No. 13CA-CV01234
)	Judge P. Walter Stoneman
EXTREME MANUFACTURING CO., and)	
AMBLE CORPORATION,)	
Individually and as a Subsidiary of)	
EXTREME MANUFACTURING,)	
)	
Defendants.)	

**PLAINTIFF’S RESPONSE TO DEFENDANTS EXTREME MANUFACTURING CO.’S
AND THE AMBLE CORPORATION’S MOTION FOR PROTECTIVE ORDER**

COMES NOW the Plaintiff, Melanie A. Anderson, by undersigned counsel, to respond to Defendants Extreme Manufacturing Co.’s and Amble Corporation’s (“Extreme/Amble”) Motion for Protective Order relating to Plaintiff’s Rule 57.03(b)(4) deposition notice.

To be entitled to a protective order, Extreme/Amble must establish good cause—that is, that the Rule 57.03(b)(4) requests are burdensome or oppressive. Extreme/Amble has not made that showing. Three of the requests, paragraphs 1, 14, and 15, are focused on oil filters Extreme/Amble designs and manufactures. The fourth request, paragraph 17, seeks information that is discoverable under Missouri law, and the statute Extreme/Amble cites, Mo. Rev. Stat. § 510.263(8) does not preclude pretrial discovery of a defendant’s net worth. It has not established that the requests are burdensome or oppressive. The motion for protective order should be denied.

ARGUMENT

I. LAW RELATING TO DEPOSITIONS OF CORPORATE DESIGNEES

Rule 57(b)(4) provides that a party serving a deposition notice on a corporation must “describe with reasonable particularity the matters on which examination is requested.” Mo. R. Civ. P. 57.03(b)(4). The corporation, in turn, “shall designate one or more officers, directors, or managing agents, or other persons . . . to testify on its behalf . . .” *Id.* Then corporate designees “shall testify as to matters known or reasonably available *to the organization.*” *Id.* (emphasis added). “The corporation . . . must not only produce such number of persons as will satisfy the request, but more importantly, prepare them so that they may give complete, knowledgeable and binding answers on behalf of the corporation.” *Starlight Int’l Inc. v. Herlihy*, 186 F.R.D. 626, 638 (D. Kan. 1999). The corporate designee’s testimony on the topics identified in the notice are admissible against, and will be binding on, the corporate party. *See State ex rel. Reif v. Jamison*, 271 S.W.3d 549, 551 (Mo. banc 2008).

In determining whether a topic listed in a Rule 57.03(b)(4) notice is too broad and not stated with “reasonable particularity,” the rule does not require exact precision as to how a topic is described.

The rule . . . requires that the matters to be covered be identified with “reasonable particularity.” By their very nature, the topics identified will be stated more broadly than an interrogatory, a request for an admission or any other specific form of discovery. In determining if a topic is overly broad, the only questions are whether the topic is relevant to the case and whether the matters to be covered are stated with sufficient clarity so that the deponent is able to discern the times, places, persons, objects, or events to be covered at the deposition. If the answers to those questions are in the affirmative, the topics are not overly broad.

State ex rel. Plank v. Koehr, 831 S.W.2d 926, 929 (Mo. banc 1992). Relevance for purposes of discovery is broadly defined to include matters relating to the subject matter of the action, a

claim or defense of a party as well as matters “reasonably calculated to lead to the discovery of admissible evidence.” Mo. R. Civ. P. 56.01(b)(1).¹

In *Plank*, the court concluded that the topics listed in the notice were relevant because they related to the identity of certain employees or independent contractors, the job site and safety at the job site. *Id.* The court noted that when a topic is overly broad, the preferred remedy is to enter an order limiting the scope of discovery rather than a blanket protective order. *Id.* See also *Steil v. Humana Kan. City, Inc.*, 197 F.R.D. 442, 444 (D. Kan. 2000) (corporate deposition notice identified subject matter with “reasonable particularity” when request identified insurance policy number at issue and asked about defendant’s corporate structure, a comparison of the policy against the policies of 5 other companies, and filings to and approval by Kansas insurance commissioner); *Ecrix Corp. v. Exabyte Corp.*, 95 F. Supp. 2d 1155, 1158 (D. Colo. 2000) (notice is not overbroad if it is “specific in the information” sought, as long as the information sought is relevant).

In the present case, the Third Amended Notice focuses on the oil filters Defendants designed or manufactured for use on the GrassCutter mower, the venting of carburetor via the oil filter, and build-up of oil pressure in mower engines. These topics all relate to the defects alleged in Plaintiff’s Petition. (See Pet. ¶¶ 42-47.) The requests Extreme/Amble object to all relate to those matters, making them relevant to the litigation, and all are stated with reasonable particularity, as discussed in detail in § II below.

¹ Rule 56.01(b)(1) provides:

In General. Parties may obtain discovery regarding *any matter*, not privileged, that *is relevant to the subject matter involved in the pending action*, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of any other party, *including* the existence, description, nature, custody, condition and location of any books, *documents or other tangible things and the identity and location of persons having knowledge of any discoverable matter.*

Mo. R. Civ. P. 56.01(b)(1) (emphasis added).

Federal courts interpreting the federal rule for deposing corporations, Fed. R. Civ. P. 30(b)(6), have held that because a corporate designee speaks for the corporation, he or she is presenting the corporation's knowledge, and that may require some investigation and advance preparation.

Rule 30(b)(6) implicitly requires the designated representative to review all matters known or reasonably available to it in preparation for the Rule 30(b)(6) deposition. This interpretation is necessary in order to make the deposition a meaningful one and to prevent the sandbagging of an opponent by conducting a half-hearted inquiry before the deposition but a thorough and vigorous one before the trial. This would totally defeat the purpose of the discovery process. The Court understands that preparing for a Rule 30(b)(6) deposition can be burdensome. However, this is merely the result of the concomitant obligation from the privilege of being able to use the corporate . . . form in order to conduct business. A party does not fulfill its obligations at the Rule 30(b)(6) deposition by stating it has no knowledge or position with respect to a set of facts or area of inquiry within its knowledge or reasonably available.

Starlight Int'l Inc., 186 F.R.D. at 638. Missouri Rule 57.03(b)(4) is substantially similar to federal Rule 30(b)(6) with minor variations in syntax and word choice. *See State ex rel. Coffman Group, L.L.C. v. Sweeney*, 219 S.W.3d 763, 767 n.2 (Mo. App. S.D. 2005) (interpretations of a federal rule of civil procedure are strongly persuasive when Missouri rule is derived from it).

II. BECAUSE THE THIRD AMENDED RULE 57.03(b)(4) DEPOSITION NOTICE COMPLIES WITH THE MISSOURI RULES OF CIVIL PROCEDURE AND THE SPECIAL MASTER'S RECOMMENDATIONS, EXTREME/AMBLE'S MOTION FOR PROTECTIVE ORDER SHOULD BE DENIED.

A. Extreme/Amble's Motion Does Not Meet the Standard for a Protective Order.

Extreme/Amble's motion for a protective order should be denied. As the parties seeking the protective order, Extreme/Amble bears the burden of proving that good cause exists for the order. Mo. R. Civ. P. 56.01(c); *cf. State ex rel. Ford Motor Co. v. Messina*, 71 S.W.3d 602, 607-09 (Mo. banc 2002) (good cause was shown to bar deposition of top Ford executives because, *inter alia*, inquiry was "tangential" and information was available through other means, the need

for discovery was slight, and executives showed that having to appear for deposition would be burdensome, expensive and oppressive).

Extreme/Amble objects to the requests on the grounds that they are over broad, vague, or not reasonably calculated to lead to the discovery of admissible information (Extreme/Amble Br. ¶ 11, at 4), or allegedly precluded by statute (*id.* ¶ 13, at 7). These objections are unfounded. The requests in the Third Amended Notice are focused on (1) oil filters for the GrassCutter line of mowers (of which there are currently only two models), and (2) venting of the carburetor. The requests were revised specifically to comply with the Special Master’s October 10 recommendations and communications from Extreme’s counsel. As discussed below, the requests are stated with reasonable particularity in that they enable Defendants “to discern the . . . objects or events to be covered at the deposition.” *See Plank*, 831 S.W.2d at 929. Because the requests are limited to matters relating to oil filters for the GrassCutter mowers, Extreme/Amble’s objections as to over-breadth, vagueness and irrelevance should not be sustained. Because Defendants have not made the required showing of good cause, the Motion should be denied.

B. The Third Amended Rule 57.03(b)(4) Notice States the Areas of Inquiry with “Reasonable Particularity.”

1. Paragraph Nos. 1 and 14: History and basis for design of oil filters for the GrassCutter Mower and their manufacturing cost

THIRD AMENDED NOTICE ¶ 1. The notices request testimony about “[t]he history of and basis for the design of the oil filters intended for use on the GrassCutter mower at issue in this case including, but not limited to, the design of the venting mechanism intended to prevent or limit pressure build-up in the carburetor.”

THIRD AMENDED NOTICE ¶ 14. The notice requests testimony about “[t]he cost of manufacture of any and all oil filters intended for use on the GrassCutter mower, including the cost of any venting design.”

Extreme/Amble interprets these requests as seeking “testimony concerning the design of *any and all* oil filters” and objects that the requests are over-broad, vague, and “not reasonably calculated to lead to the discovery of admissible evidence.” (Extreme/Amble Mot. at 4 (emphasis added).) This interpretation is belied by the precise wording of the requests, as they are specifically limited to “oil filters manufactured for the *GrassCutter mower at issue in this case.*” (3d Am. Notice ¶¶ 1, 14 (emphasis added).) The requests focus the oil filters’ development, design, and manufacturing, and manufacturing costs. They are directly linked to a key factual issue in the case, pressure build-up in the carburetor; indeed, that factual issue is specifically referred to in paragraph 1. Plaintiff clearly is entitled to ask about the oil filters on the GrassCutter mower, since this case involves a fire that Plaintiff contends was caused by a defect involving the oil filter. (See Pl.’s Pet. ¶¶ 56-59.) See *Unverferth v. City of Florissant*, No. ED 98511, 2013 WL 4813851, at *13 (Mo. App. E.D. Sept. 10, 2013) (plaintiff was “entitled to the opportunity to support her allegations with facts developed through discovery” to “establish a factual basis for her allegation that the primary and fundamental purpose of [a “Robocop” traffic-light camera] is revenue generation”), *transfer denied* (Mo. Oct. 22, 2013). Thus, these requests are clearly within the scope of permissible discovery set forth in Rule 56.01(b)(1). See *Steil v. Humana Kansas City, Inc.*, 197 F.R.D. 442 (D. Kan. 2000) (notice is not overbroad when its plain language identifies the subject matter of the testimony sought). The over-breadth, vagueness and relevance objections to these requests should be overruled.

Extreme/Amble then asserts that the request must be limited to the particular filter on the mower at issue and Plaintiff has not identified that filter. (Extreme/Amble Mot. at 4.) Because the filter was not found after the fire, it is impossible to identify it with certainty at this time.

Given that the GrassCutter was first sold in 2001 (Sanders Dep. at 16, attached as Pl.’s Ex. 4)² and the original oil filter was recalled in 2007 (Pl.’s Ex. 910), the *possible* oil filters Extreme/Amble may have provided to Extreme *for the GrassCutter mower* at issue are not infinite. These oil filters are relevant to the case because they show that non-defective filters were available at the time the mower was designed and manufactured. Indeed, the Recall Notice specifically identifies a replacement filter, part number 123456 (Figure E) and three other filters not subject to the recall (Figures B–D).³ Oil filters designed after the Recall Notice are also relevant to show alternative, non-defective designs for the GrassCutter oil filter.

Extreme/Amble cites *State ex rel. Kawasaki Motors Corp., U.S.A. v. Ryan*, 777 S.W.2d 247 (Mo. App. E.D. 1989), to support its contention that Plaintiff’s requests must be focused on the specific oil filters on the Knowlens’ mower. (Extreme/Amble Mot. at 4.) In *Kawasaki*, however, the discovery request related to “any and all models” of Kawasaki ATVs—a total of 38 models—and the court stated that the request must relate instead to the “three-wheel Tecate series involved and the allegedly defective components at issue.” *Id.* at 252-53 (emphasis added). Here, Plaintiff’s requests are limited to oil filters intended for “the *GrassCutter mower at issue in this case*” and the venting mechanism in the carburetor is one of the defective components at issue.

The request for information about oil filters intended for the GrassCutter also relates to feasibility of corrective action or a feasible alternative design, and evidence of feasible alternatives is admissible to support a plaintiff’s claims. *Smith v. Brown & Williamson Tobacco*

² The Sanders deposition was taken for a Florida case, *Concepcion v Extreme Indus., Inc., et al.*, (Fla. Cir. Ct. Broward County). Mr. Sanders was/is a mechanical engineer employed by Extreme.

³ The recall notice itself is not limited to the GrassCutter mower. It applied to “[a]ll GrassCutter, Super Macro Z and Fusion units that have the oil filter shown in Figure A. These units were built with and including serial number 0123456 thru 7894564.” (Pl.’s Ex. 910, at 1.)

Corp., 275 S.W.3d 748, 794 (Mo. App. W.D. 2008) (“Certainly, the plaintiff may introduce such evidence in support of showing the design was defective and therefore unreasonably dangerous”) (citation omitted). Consequently, the discovery should be permitted. *See generally* Mo. R. Civ. P. 56.01(b)(1); *Unverferth*, 2013 WL 4813851, at *13 (plaintiff must be given a chance to discover facts that support allegations made in petition).

Further, the constricted view of relevance for purposes of discovery stated in *Kawasaki* contradicts a more recently stated view on the subject. In keeping with the trend nationally, the Missouri Court of Appeals has expressly rejected this so-called “single product rule” in favor of a much broader view of admissibility and discoverability of other similar incidents (“OSI”) in products-liability cases. *See Stokes v. Nat’l Presto Indus. Inc.*, 168 S.W.3d 481, 484-86 (Mo. App. W.D. 2005), *transfer denied* (Mo. Aug. 30, 2005).⁴

In *Stokes*, a products-liability case involving OSI evidence, the court concluded that a trial court “abused its discretion” by adopting and applying a “single product rule,” that “restricted evidence of previous incidents to those involving Kitchen Kettle units, [the model of the device that allegedly injured plaintiff].” *Id.* at 484. The Court of Appeals reversed, holding that the proper standard is simply that if the other incidents—even those that involve other model products—are substantially similar, the plaintiff should be able to present evidence of them and certainly is entitled to propound discovery related to these other incidents. *Id.* at 484, 485-86. The Missouri Supreme Court did not take the subsequent appeal.

Stokes involved the admissibility of OSI evidence. Extreme/Amble’s motion relates to the *discoverability* of information relating to oil filter for the GrassCutter product line other than

⁴ The *Stokes* case and the case law relating to OSI evidence is briefed in detail in Plaintiff’s Motion to Compel Defendant Extreme Industries, Inc.’s Production of Documents Pursuant to Plaintiff’s Fifth Request for Production of Documents. (*See* Mot. filed 11/15/2013, at 3–8.) The brief pointed out that, when determining whether two products or injury-causing incidents are substantially similar, the focus is on the particular *defect* alleged. (*Id.*)

the specific one on the Knowlens' mower, as that fact cannot be determined. Because the single-product rule has been superseded in the context of admissibility of evidence at trial, it follows that it should not be followed in the context of pretrial discovery. *Stokes* stands for the proposition that in a products-liability case, discovery should not be focused on the exact same model as the one at issue, but at the very least, models within the same product line. Thus Plaintiff is entitled to discovery relating to the oil filters intended for the GrassCutter line of mowers.

Extreme/Amble also contends that in 2004, they “had available a variety of oil filters of different sizes with different size mechanisms.” (Extreme/Amble Mot. at 5.) It extrapolates from that statement that “thousands of filter characteristics are available” and “[c]ustomers choose among Extreme/Amble’s filter varieties for the filter which the customer has determined is suitable for its application.” (*Id.*) Plaintiff, of course, has not asked for testimony relating to “thousands of filter characteristics”; she is focused on oil filters intended for the GrassCutter mower.

With respect to the request for information about manufacturing costs (*see* 3d Am. Notice ¶ 14), Extreme/Amble first asserts that the cost of manufacture of “any and all oil filters” is “unduly burdensome, oppressive, and not reasonably calculated to lead to the discovery of admissible evidence” and that the request is not relevant or reasonably calculated to lead to the discovery of admissible evidence. (Extreme/Amble Mot. at 5-6.) Here, too, Extreme/Amble has overstated the scope of Plaintiff’s request. Again, Plaintiff is interested in the oil filters intended for the GrassCutter mower. This information is highly relevant, as it relates to the feasibility of corrective action or a feasible alternative design, evidence of which is admissible to prove a product-liability claim. *See Duke v. Gulf & Western Mfg. Co.*, 660 S.W.2d 404, 413 (Mo. App.

W.D. 1983) (court admitted into evidence deposition of defense witness who testified as to feasibility of providing guards for power press, “both as to cost and technological possibility”; cost of interlocking barrier was about \$1000, or 5-10% of press’s cost and cost was not reason guards were not in design). *See also Smith v. Brown & Williamson Tobacco Corp.*, 275 S.W.3d at 793-74; Mo. R. Civ. P. 56.01(b)(1).

Second, Extreme/Amble asserts that information about the cost of manufacture “involves proprietary and sensitive information critical to Extreme/Amble’s profitability and success in the marketplace.” (Extreme/Amble Mot. at 6.) If Extreme/Amble is concerned about revealing proprietary information such as profit margins, a protective order may well be appropriate, *see* Mo. R. Civ. P. 56.01, but Extreme/Amble is not entitled to withhold testimony completely.

2. **Paragraph No. 15: Design and cost of Extreme/Amble oil filters for mowers that use alternative carburetors or mechanisms**

THIRD AMENDED NOTICE ¶ 15. The notice requests testimony about “[t]he design and cost of any oil filter utilizing alternative carburetors or mechanisms that are manufactured by Extreme Manufacturing Co. or Amble Corporation for use on lawn-tractors and/or riding mowers.”

As it did with respect to paragraphs 1 and 14, Extreme/Amble asserts that the request in paragraph 15 is too broad. It contends that it “does not design [oil filters] ‘intended to be mounted on lawn-tractors and/or riding mowers’ as opposed to any other gas-powered product.” (Extreme/Amble Mot. at 6.) Again, the purpose of the request is to discover what other designs for oil filters are available—that is, it relates the feasible design alternatives, which is admissible evidence. *See Brown & Williamson*, 275 S.W.3d at 793. Extreme/Amble acknowledges this point: “[P]laintiff seeks information concerning *alternative* mechanisms.” (Extreme/Amble Mot. at 6.) Cost is a factor to consider in determining whether a design alternative is feasible. *See Duke*, 660 S.W.2d at 413 (court properly admitted deposition of defense witness who testified as

to feasibility of providing guards for power press, “both as to cost and technological possibility”). Consequently the requested information is relevant.

C. Section 510.263(8) Applies to “Assets” and Does Not Preclude Discovery About “Financial Status” or “Financial Condition”

THIRD AMENDED NOTICE ¶ 17. Paragraph 17 requests testimony and production of documents about “[t]he current financial state of Extreme Manufacturing Co. and Amble Corporation.”

Extreme/Amble contends that a statute precludes discovery of their financial status until a later stage of the proceeding. (*See* Extreme/Amble ¶ 13, at 7 (citing Mo. Rev. Stat. § 510.263(8)). The statute, however, does not refer to discovery about a defendant’s “financial status”; it refers to “[d]iscovery as to a defendant’s *assets*.” Mo. Rev. Stat. § 510.263(8) (emphasis added). “Assets” and “financial status” are not the same thing. The legal definition of “assets” relates to property subject to the payment of debts:

The word, though more generally used to denote everything which comes to the representatives of a deceased person, yet is by no means confined to that use, but *has come to signify everything which can be made available for the payment of debts . . . and we always use this word when we speak of the means which a party has, as compared with his liabilities or debts.*”

Black’s Law Dictionary 151 (4th ed. 1951) (emphasis added). The dictionary definition of “assets” similarly includes “the entire property of a person, association, corporation, or estate applicable or subject to the payment of debts: an item of value owned: the items on a balance sheet showing the book value of property owned.” Merriam Webster’s Collegiate Dictionary (10th ed. 1995).

The terms “financial state,” “financial status” or “financial condition,” in contrast, have a broader connotation and include both assets and debts, providing a more complete picture of what a person owns and what a person owes; it refers to a person’s net worth. *See Cadwell v.*

Joelson (In re Joelson), 427 F.3d 700, 705-07 (10th Cir. 2005) (“financial condition” as used in Bankruptcy Code refers “to the difference between an entity’s overall property and debts—the entity’s net worth”). *Accord Bandi v. Bechnel (In re Bandi)*, 683 F.3d 671, 677 (5th Cir. 2012) (same), *cert. denied*, 133 S. Ct. 845 (2013).⁵

Significantly, another provision of § 510.263 states that “[e]vidence of such defendant’s *net worth* shall be admissible during the second stage of trial.” Mo. Rev. Stat. § 510.263(3) (emphasis added). By definition, “net worth” encompasses both assets and liabilities. It is the “remainder after deduction of liabilities from assets.” Black’s Law Dictionary 1193 (4th ed. 1951). “Net worth,” as noted above, is closer in meaning to “financial condition,” “financial status,” and “financial condition.”

The Missouri Supreme Court emphasizes that the plain meaning of a statute controls unless the language is ambiguous or leads to an illogical or absurd result.

The primary rule of statutory interpretation is to effectuate legislative intent through reference to the plain and ordinary meaning of the statutory language. This Court must presume every word, sentence or clause in a statute has effect, and the legislature did not insert superfluous language. “When the words are clear, there is nothing to construe beyond applying the plain meaning of the law.” A court “will look beyond the plain meaning of the statute only when the language is ambiguous or would lead to an absurd or illogical result.”

Bateman v. Rinehart, 391 S.W.3d 441, 446 (Mo. banc 2013) (citations omitted) (quoting *State ex rel. Valentine v. Orr*, 366 S.W.3d 534, 540 (Mo. banc 2012), and *Akins v. Dir. of Revenue*, 303 S.W.3d 563, 565 (Mo. banc 2010)).

The plain meaning of the statute indicates that subsection (8) does not apply to this discovery request. Because the statute addresses using evidence of net worth at trial, it is clear

⁵ No Missouri case was found defining “financial condition,” “financial status,” or “financial state.” The Eighth Circuit noted with respect to another Missouri statute using the term that the term was not defined in the statute and stated: “Missouri case law on the issue is scant.” *Boner v. Eminence R-1 Sch. Dist.*, 55 F.3d 1339, 1341 (8th Cir. 1995).

that a plaintiff is entitled to discover evidence of “net worth.” Missouri case law also permits discovery of a defendant’s financial condition. *See, e.g., State ex rel. Newman v. O’Malley*, 54 S.W.3d 695, 697 (Mo. App. W.D. 2001) (plaintiff may seek discovery of financial condition to support punitive-damage claim).

The use of the word “net worth” in one section and the word “assets” in another section of the same statute indicates something different was meant when the Assembly used the word “assets.” Because the legal meaning of the word “assets” refers to actual property available for the payment of debts—property that is subject to execution of a judgment—the logical meaning of § 510.263(8) is that it relates to post-judgment collection proceedings. While Missouri does not allow judgment creditors to make requests for admissions from judgment debtors, interrogatories, depositions, document requests, and entries on land are permitted. *See Mo. R. Civ. P. 76.28* (judgment creditor “may obtain discovery as provided by Rules 57.01, 57.03, 57.04, 57.05, 57.06, 57.05, 57.09, 57.10, and 58.01 and may enforce discovery as authorized by Rule 61.01”). Significantly, Rule 76.28 uses the term “assets” in the same manner as argued above. It states, “the *scope of post-judgment discovery shall be limited to matters, not privileged, that are relevant to the discovery of assets, including insurance, or income subject to execution or garnishment for the satisfaction of judgments.*” *Id.* (emphasis added).

Thus, the logical interpretation of § 510.263(8) is that it precludes discovery of a defendant’s *property holdings*, but does not preclude discovery of the defendant’s overall financial condition, both assets and liabilities. This interpretation reads the statute as a whole and honors the plain meaning of each term. Because the plain meaning of the § 510.263(8) does not preclude discovery of Extreme’s/Amble’s financial condition, they are not entitled to a protective order for this request.

CONCLUSION

For the reasons stated above, Plaintiff Melanie A. Anderson respectfully requests the Defendants Extreme's/Amble's Motion for Protective Order be denied.

Respectfully submitted,

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