

SUPERIOR COURT
STATE OF NEW YORK STEUBEN COUNTY

PAUL A. ARGENTIERI,

PLAINTIFF,

v. VERIFIED COMPLAINT
 JUDICIARY LAW SEC. 487

ORIN S. SNYDER, ALEXANDER H.
SOUTHWELL, MATTHEW J. BENJAMIN,
GIBSON, DUNN & CRUTCHER LLP AND
JOHN DOE LAWYERS 1-20 WHOSE
IDENTITIES ARE CURRENTLY UNKNOWN,

DEFENDANTS.

Case No. _____

AFFIDAVIT OF
MICHAEL T. MCKIBBEN

State of Ohio }
 } ss:
County of Delaware }

FIRST BEING DULY CAUTIONED AND SWORN, AFFIANT STATES:

1. My name is Michael T. McKibben, and I am of legal age, sound mind and otherwise competent to make this affidavit. At all times herein, I lived in Columbus, Ohio and work for Leader Technologies, Inc. ("Leader") in Lewis Center, Ohio. I have personal, direct knowledge of each of the facts set forth in this affidavit and they are true to the best of my knowledge and ability.

2. I am an expert in leadership, organizational development and human-computer interface software design and programming with specialties in electronic messaging, social networking, groupware, conference calling, large-scale emergency alerting, team building, complex problem solving, storyboarding, management development, productivity systems, engineering, planning, program design, intellectual property, trade secrets, copyrights, trademarks and patents, among others.

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Regarding my expertise, in August-October 2005, Leader provided the only working large-scale disaster response communications system for conferencing, alerting, documents and news for State of Louisiana's Governor Kathleen Blanco, all Louisiana state agencies, The American Red Cross, the U.S. Army Corps of Engineers and FEMA following Hurricanes Katrina and Rita after almost all state and federal systems had failed. Katrina was one of the costliest natural disasters and one of the five deadliest hurricanes in the history of the United States.

As a private contractor to AT&T in 1995, I led the rapid redevelopment of AT&T AccessPlus 3.0 email, enhanced fax and electronic data interchange (EDI) messaging application in collaboration with AT&T Bell Labs Lincroft who provided my quality assurance testing.¹

I hold three patents in telecom and social networking: U.S. Patent Numbers 7,139,761, 7,925,246 and 8,195,714. *See* U.S. Patent Office: U.S. Pat. No. 7,139,761, Dynamic Association of Electronically Stored Information with Iterative Workflow Changes, Nov. 21, 2006; U.S. Pat. No. 8,195,714 on Jun. 5, 2012, Context Instantiated Application Protocol, Jun. 05, 2012; and U.S. Pat. No. 7,925,246, Radio/Telephony Interoperability System, Apr. 12, 2011. Full copies of these patents are available at the U.S. Patent Office website at <http://patft.uspto.gov/netahtml/PTO/search-adv.htm>.²

3. My company and I are the victims of the same concealment of Facebook and Mark Zuckerberg 2003-2004 Harvard evidence that has been withheld in *Ceglia v. Zuckerberg*, *U.S. v. Ceglia* ("*Ceglia*") and *ConnectU v. Facebook* ("*ConnectU*") among others. Complete citations for these cases are provided below.

¹ *See* AT&T Mail. (1995). AT&T AccessPlus 3.0 – The smart way to manage mail. A powerful information tool that helps you create, manage and communicate your messages faster and more easily. And now a great thing just got better, with enhancements that make the software even more powerful and flexible [Brochure]. MS-7469. AT&T EasyLink Services; *See also* John W. Frees. (1995). Small firm helps AT&T cure program headache. *Business First*; Ron Lietzke. (Feb. 19, 1996). New software spruces up E-mail text . . . gives electronic mail the power of a word-processing system. *The Columbus Dispatch*. Facsimiles of these articles shall be provided upon request.

² Documentation of the abovementioned experiences is too voluminous to enclose and will be made available upon request.

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In our *Leader Technologies, Inc. v. Facebook, Inc.*, 08-cv-862-JJF-LPS (D. Del. 2008) case, Facebook clearly lied about the existence of Mark Zuckerberg's 2003-2004 computer information—which these *Ceglia* facts reveal were in the custody of Facebook's attorneys the entire time. (“*Leader v. Facebook*”).

4. I read Paul Argentieri's filing on June 1, 2017 in *U.S. v. Ceglia* 12 Cr. 876-VSB (S.D.N.Y. 2012) including his four exhibits (which are available on Pacer.gov).

Exhibit A. I promptly contacted Mr. Argentieri with evidence that the very same 28 Zuckerberg computer devices and Harvard emails from 2003-2004, which Mr. Argentieri says has never been able to be analyzed by *Ceglia* attorneys, is the *very same evidence* that was concealed in our *Leader v. Facebook* case (the “Zuckerberg Information”).

5. Facebook, through their Gibson Dunn LLP associates at Cooley Godward LLP (these firms teamed up on our appeal), told us a month before trial in *Leader v. Facebook* that they ‘lost’ this Zuckerberg Information. During the previous year they had never once said that the Zuckerberg Information did not exist or was lost. Rather, they prevaricated, refused to produce the information and wasted the court's time with interminable motion practice. In the end, we were forced to go to trial without being able to review this obviously seminal Zuckerberg Information despite multiple motions and requests.

6. **The 28 Zuckerberg computing devices and Harvard emails that had been ‘lost’ in *Leader v. Facebook* were later ‘found’ by Gibson Dunn LLP in *Ceglia*.**

This occurred just two days after Leader's appeal ended where Gibson Dunn LLP represented Facebook, but who failed to disclose that they were concealing critical evidence.

While hiding the Zuckerberg Information, Gibson Dunn LLP was simultaneously representing the Federal Circuit chief judge and panel in *Leader v. Facebook* in an ethics complaint as well.

From the *Ceglia* cases we now learn that the Zuckerberg Information had been inventoried in *ConnectU, Inc. v. Facebook, Inc. et al*, Case No. 2007-10593-DPW (*ConnectU*) and was specifically

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concealed from discovery in our case. Then, just two days after our *Leader v. Facebook* appeal ended, these ‘lost’ 28 Zuckerberg computing devices and Harvard emails were magically ‘found’ by Gibson Dunn LLP. The information was presented for review by Facebook-selected experts. It is my informed understanding that *Ceglia* attorneys were never permitted to perform a forensic examination on the Zuckerberg Information. *See* Exhs. B, C.

In addition, Gibson Dunn LLP failed to disclose in *Leader v. Facebook* that their appeals attorney, Thomas G. Hungar, was also separately representing the Federal Circuit court itself, including Chief Judge Randal R. Rader. The deception and collusion is evident. *See* Sec. 23(g).

7. Mr. Argentieri provided me with a copy of the transcripts of depositions conducted by Mr. Dean Boland, his *Ceglia* co-counsel. Mr. Boland deposed Facebook’s Stroz Friedberg LLC forensic experts Bryan J. Rose on July 18, 2012 (**Exhibit B**), and Michael F. McGowan on July 19, 2012 (**Exhibit C**), at the law offices of Facebook attorney Gibson Dunn LLP in New York.

8. Mr. McGowan stated that:

“... approximately 28 devices belonging to Mr. Zuckerberg were presented to us for examination ... involved in the Winklevoss ConnectU case, if you know?.

Q. In the ConnectU case?

A. Yes.”

Ex. C, Tr. 61:16-18; 78:17-20.

9. Mr. Rose stated that he examined:

“... copies of Mark Zuckerberg’s Harvard e-mail ... and other hard drives ... that Mr. Zuckerberg had used historically ...”

contained on

“... somewhere in the neighborhood of 15 to 20” of the computers presented to them.

Ex. B, Tr. 32:11-20; 33:2-3.

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10. Mr. Rose described troubling spoliation of the Zuckerberg devices, stating:

“ . . . there’s been manipulation of the system clock,”
(and thus spoliation, stating)
“[t]his document is clearly backdated.”
Ex. B, Tr. 246:16-17, 20-21.

Changes to a system clock will falsify the metadata for any file that is saved while the clock is incorrect.

11. **Evidence of Spoliation.** In my opinion, the system clock manipulation of the Zuckerberg Information computing devices is almost certainly spoliation by someone with access to the devices in Gibson Dunn LLP’s custody.

12. Therefore, according to Facebook’s own experts, the record shows that Facebook is not only blocking *all* access to the Zuckerberg Information, but someone with access to the devices is manipulating the evidence in custody. Specifically, Facebook and their lawyers deceived the *Leader v. Facebook* court and colluded among multiple law firms to lie about the existence of the 28 Zuckerberg computer devices and Harvard emails.

13. On November 19, 2008, my company, Leader Technologies, Inc., sued Facebook, Inc. in the District Court for the State of Delaware for patent infringement of U.S. Patent 7,139,761 titled “Dynamic Association of Electronically Stored Information with Iterative Workflow Changes” for which I am the first-named inventor. *Leader v. Facebook*.

14. On February 20, 2009, Leader filed its first discovery request that included all historical Facebook information from the formative 2003-2004 time period, including the Zuckerberg Information produced in the *ConnectU, Inc.* lawsuit against them. **Exhibit D.**

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15. **“Facebook refuses to provide.”** On April 30, 2009, Leader filed a motion to compel Facebook to provide the requested discovery which our attorneys Philip A. Rovner, Paul J. Andre and Lisa Kolbialka told the court “Facebook refuses to provide.” **Exhibit E**.

The motion included specific Zuckerberg Information cited in Doc. No. 42-17 as delineated by Magistrate Robert B. Collins in *ConnectU, Inc. v. Facebook, Inc. et al*, Case No. 2007-10593-DPW on September 13, 2007 (*ConnectU*). **Exhibit F**:

“Facebook was ordered to catalog information and devices containing the information “defined as (a) the Harvard Connection code which Zuckerberg allegedly worked on, (b) the facebook.com code before launch, (c) the facebook.com code at the time of launch, (d) the facebook.com code through September 2004, (e) the coursemash code, and (f) the Facemash code”

16. For approximately fifteen (15) months following Leader’s motion to compel, Facebook and their lawyers stonewalled providing any Zuckerberg Information from 2003-2004—even though it was directly relevant to: (a) Leader’s willful infringement claim, (b) expert analysis of the source code “change logs” to determine when the infringement began, and (c) despite numerous appeals to the court for relief by Leader’s attorneys.

17. On or about May 15, 2010—a month before trial—I was informed by Leader’s attorney Paul Andre that Facebook’s attorney informed him, under the Protective Order, that Facebook and their lawyers could not locate any of the *ConnectU* Zuckerberg Information. The material gist of the Facebook disclosure to Mr. Andre was that neither Facebook or Zuckerberg nor their attorneys could produce the *ConnectU* information (Zuckerberg Information) because it had disappeared. Tellingly, Facebook had not informed the court or our attorneys at any time previously that they could not locate the requested Zuckerberg Information. Instead, they prevaricated and repeatedly objected to the motions to compel their production.

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18. Mr. Argentieri just provided me with a copy of an August 19, 2011 “ORDER FOR DISCOVERY OF COMPUTER MEMORY DEVICES” in *ConnectU*. This order specifically cites the *same* Doc. No. 42 that was also cited by Leader in our motion to compel on April 30, 2009. *See* Sec. 14 above. **Exhibit G**. In other words, the 2007 *ConnectU* Magistrate’s order to create an inventory of the Zuckerberg Information—that was cited in the Leader’s motion to compel on April 30, 2009—was carried out, and the list later appeared in an August 19, 2011 *ConnectU* order that Mr. Argentieri just provided to me.

19. **Gibson Dunn LLP’s unfaithful custodianship**. Therefore, the record confirms that the *ConnectU* information requested by Leader is the *very same information* identified by: (a) *ConnectU*, (b) that was analyzed by Messrs. Rose and McGowan, (c) that is in the custody of Facebook attorney Gibson Dunn LLP, (d) that is in the custody of Mark Zuckerberg’s attorney McManus Faulkner LLP, (e) and that was and may still be in the custody of *ConnectU*’s expert Jeff Parmet and Associates LLC.

20. Mr. McGowan was asked:

<p>“Q. When did this examination occur of these 28 devices belonging to Mr. Zuckerberg? A. In around September of 2010.” Ex. C, Tr. 64:18-20.</p>
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21. The record clearly confirms that the 28 Zuckerberg *ConnectU* computer devices and Harvard emails that were produced by Facebook for examination by Facebook experts in September 2010 is the *same information* we were denied with false statements by Facebook and its lawyers in *Leader v. Facebook*

22. To reiterate, these same 28 Zuckerberg *ConnectU* computer devices and Harvard emails produced later in *Ceglia* were *hidden* from the court in *Leader v. Facebook* ***just six weeks***

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earlier. A reasonable person can clearly see that the claim that the Zuckerberg Information was ‘lost’ for review in *Leader v. Facebook* was an obvious lie.

23. **Gibson Dunn LLP’s deceit and collusion.** Evidently, the Facebook and Zuckerberg concealment of the 28 Zuckerberg computer devices and Harvard emails was and is directed by Facebook’s attorney Gibson Dunn LLP according to their hand-picked Stroz Friedberg experts, Bryan J. Rose and Michael F. McGowan.

The record shows that:

(a) Gibson Dunn LLP has represented Zuckerberg and Facebook in both the *Ceglia* civil matter as well as Paul Ceglia’s indictment, while also representing Zuckerberg and Facebook in the *Leader v. Facebook* appeal, while also serving as counsel to the Federal Circuit judges and *Leader v. Facebook* panel—the conflicts of interest, deception and collusion is quite evident to a reasonable person in hindsight;

(b) U.S. Attorney Preetinder Bharara from the Southern District of New York in the Ceglia criminal indictment is a former Gibson Dunn LLP partner.³ Following his dismissal as U.S. Attorney S.D.N.Y. in 2017 by President Donald J. Trump, Mr. Bharara joined *CNN* and was hired by Special Counsel Robert S. Mueller, III in the investigation involving Russian matters that, among other things, likely implicate American officials in (i) the Russian ROSATOM/Uranium One scandal, (ii) the Hillary Clinton State Department, (iii) The Clinton Foundation and (iv) other pay to play corruption. *See* Daniel Chaitin. (July 1, 2017). Special counselor adds former Preet Bharara prosecutor to Russia probe. *Washington Examiner*.

(c) Just three months after approving the sale of 20% of America’s uranium reserves to Russia’s ROSATOM on June 16, 2009, Secretary of State Hillary Clinton entered

³ Preet Bharara. <https://its.law.nyu.edu/facultyprofiles/index.cfm?fuseaction=profile.biography&personid=46421>; *See also* <https://upclosed.com/people/preet-bharara/>

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into secret contracts with Facebook, managed by Facebook manager Dmitry Shevelenko, to build “a template for winning elections” using Facebook. This was at about the same time that Facebook and Zuckerberg were lying about the very existence of this Zuckerberg Information in *Leader v. Facebook*, and then in *Ceglia* matters—all evidence that was hidden by Gibson Dunn LLP’s and in their custody the entire time.

(d) News breaking during the preparation of this affidavit called “The Paradise Papers” shows that on March 26, 2009 Facebook received \$200 million dollars from Russian Yuri Milner who was acting on behalf of Russian President Vladimir Putin. This **occurred at the very same time that Facebook was stonewalling the Zuckerberg Information in *Leader v. Facebook***. See Wolff, M. (Oct. 21, 2011). “How Russian Tycoon Yuri Milner Bought His Way Into Silicon Valley.” *Wired*. See also Jon Swaine and Luke Harding. (Nov. 5, 2017). “Russia funded Facebook and Twitter investments through Kushner associate.” *The Guardian*.

(e) A reasonable person can see that these Russian entanglements provided ample incentive to lie about the Zuckerberg Information in *Leader v. Facebook*, while Facebook was simultaneously benefiting from \$200 million in Yuri Milner / DST USA II funds. These funds and the Russian relationships are evidently associated with Bill and Hillary Clinton, The Clinton Foundation, Barack Obama and Larry Summers. Summers is the former Harvard president (during the Ceglia-Zuckerberg contract), former Clinton Treasury Secretary, and former Obama 2008 director of the National Economic Council overseeing the payout of hundreds of billions of dollars in “bailouts” to the banks. Notably, it is notoriously known that Summers employed both Milner and Sheryl K. Sandberg at the World Bank in 1993. Sandberg became the chief operating officer at Facebook on March 14, 2008. *Id.*

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(f) **Secret Facebook contracts with Hillary Clinton and the State Department (2009-2012) for “a template for winning elections.”** Starting on September 26, 2009, Secretary of State Hillary Clinton and the U.S. State Department entered into multiple contracts with Facebook that have only become known through Freedom of Information Act (FOIA) productions of Ms. Clinton private email server to corruption watchdog Judicial Watch on April 3, 2014. For example, see \$120,000 GSA Contract, September 26, 2009, No. SAQMMA09M1870 with Facebook to provide "Facebook pages to build an international community to discuss relevant issues of the day" managed by Facebook manager Dmitry Shevelenko. **Exhibit H.**

Mr. Shevelenko wrote on his LinkedIn profile that these contracts:

“[e]stablished a template for winning elections using advanced Facebook marketing” <u>Exhibit I.</u>

At least ten (10) contracts totaling \$701,786 were entered into between Facebook and Hillary Clinton’s State Department between Sep. 26, 2009 and Jan. 03, 2013—GSA Nos. SAQMMA09M1870, PC10825, PC10825, PC10825, SAFMMA09M1870, SAFMMA09M1870, PC10825, PC10825, SSA70011M3029, SAF20013M0397. **Exhibit J.**

(g) **Obstruction of Justice: “Facebook Field Guides” were published during the pendencies of *Leader v. Facebook and Ceglia*.** Secretary Clinton and the U.S. State Department hid the existence of a four-part series of “Facebook Field Guides” that were discovered on Hillary Clinton’s personal email server by corruption watchdog Judicial Watch:

“Facebook Part 1: Getting Started with Facebook - A field guide for missions, posts and IRCs.” International Information Programs, Office of Innovative Engagement, Dec. 26, 2012.

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“Facebook Part 2: Creating and Customizing Your Page - A field guide for missions, posts and IRCs.” International Information Programs, Office of Innovative Engagement, Jun. 26, 2012.

“Facebook Part 3: Creating and Customizing Groups - A field guide for missions, posts and IRCs.” International Information Programs, Office of Innovative Engagement, Oct. 24, 2012.

“Facebook Part 4: Metrics, Analytics and Resources - A field guide for missions, posts and IRCs.” International Information Programs, Office of Innovative Engagement, Jul. 27, 2012.

Since these “Facebook Field Guides” were published during the pendencies of both *Leader v. Facebook* and *Ceglia*, they are clearly evidence of obstruction of justice since federal agencies and employees are prohibited from interfering in judicial proceedings under the 14th Amendment. Tellingly, these guides even publish State Department Facebook email addresses: “**USgovernment@fb.com.**” **Exhibit K.**

FACEBOOK Part 2: Creating and Customizing Your Page

A field guide for missions, posts and IRCs



7/26/2012

U.S. Department of State

International Information Programs

Office of Innovative Engagement

OIE.Support@state.gov

REVIEW AUTHORITY: Barbara Nielsen, Senior Reviewer

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- When selecting your **Facebook Page name**, we suggest something that will identify your institution, such as U.S. Embassy Post-name or U.S. Embassy Post-name Information Resource Center. *You cannot change your Facebook Page name once it has been selected!*
- If your page is on Wikipedia, it may have been preemptively created as a Community Page. If you see this, contact USgovernment@fb.com and ask them to take that page down in order to alleviate confusion.

Accessing Your Page
Go to: <http://www.facebook.com>

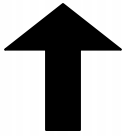


Figure 1--United States. Department of State. Facebook Part 2: Creating and Customizing Your Page - A field guide for missions, posts and IRCs. International Information Programs, Office of Innovative Engagement, Jun. 26, 2012, pp. 1, 3. *Judicial Watch v. U.S. State Department (FOIA)*, Doc. No. C05371175, Case No. F-2012-29278, 09/04/2013.

(i) Gibson Dunn LLP's Thomas G. Hungar represented Facebook in the *Leader v. Facebook* appeal before the U.S. Court of Appeals for the Federal Circuit ("Federal Circuit"). **Exhibit L**. At the same time, Mr. Hungar was representing the Federal Circuit judges themselves, and notably Chief Judge Randall R. Rader, in a conflict of interest complaint. See *Ass'n for Molecular Pathology v. USPTO*, Case No. 2010-1406 (Fed. Cir. 2010) re. Case No. 09-CV-4515-RWS (SDNY 2009).

Neither the Federal Circuit judges nor Mr. Hungar disclosed this evident conflict of interest in *Leader v. Facebook*. **Exhibit M**;

(j) The Gibson Dunn LLP *Ass'n for Molecular Pathology* representation included Federal Circuit Bar Association attorney Edward R. Reines, Weil Gotshal LLP.

On May 23, 2004, Mr. Reines—Gibson Dunn LLP's co-counsel—was caught colluding with Chief Judge Randal R. Rader. Mr. Reines subsequently resigned from the Federal Circuit bench. Judge Rader had allowed Mr. Reines to make an appearance in the *Leader v. Facebook* appeal. **Exhibit N**.

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See also Entry No. 53, Response of *Amicus Curiae* Dr. Lakshmi Arunachalam to Federal Circuit Bar Association (FCBA) Request for reissue of Order as Precedential (undocketed), served Sep. 18, 2014 in *Leader Tech v. Facebook*, Case No. 2011-1366 (Fed. Cir. 2011), PDF pp. 30-36. **Exhibit Q**.

(k) Chief Justice John G. Roberts, Jr. presided over Leader Technologies, Inc.'s Petition for Writ of Certiorari to the U.S. Supreme Court in *Leader v. Facebook* following the Federal Circuit's failures to: (i) follow their own well-settled precedent in *Group One* and *Pfaff*, and (ii) disclose the panel's substantial pre-IPO (initial public offering) holdings of Facebook financial interests, not to mention their intertwined relationships with Facebook attorneys. *See* Petition for Writ of Certiorari (Nov. 16, 2012), *Leader Technologies, Inc., v. Facebook, Inc.*, No. 12-617 (U.S. Supreme Court 2012). *See* analysis of Justice Roberts' 2012 financial disclosure. **Exhibit P**.

In addition, Chief Justice Roberts himself failed to disclose his own holdings of substantial Facebook financial interests. Further, Justice Roberts failed to disclose that he is a close mentor to Thomas G. Hungar, Gibson Dunn LLP partner and Facebook attorney in *Leader v. Facebook*, as admitted by Mr. Hungar on September 30, 2009. *See* Law 360 (Sep. 30, 2009). Q&A with Gibson Dunn's Thomas Hungar. *Portfolio Media, Inc.*, **Exhibit Q** ;

(j) Gibson Dunn LLP's partner Jose W. Fernandez was appointed by Secretary Clinton as Assistant Secretary of State for Economic, Energy and Business Affairs from 2009 to 2013. Following the election of Donald J. Trump, Mr. Fernandez returned to Gibson Dunn LLP and now provides representation to former Secretary Clinton before the Judiciary Committee's investigations into the Russian ROSATOM Uranium One and The Clinton Foundation. **Exhibit R**.

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Gibson Dunn LLP has clearly failed to disclose their many conflicts of interest in these matters pursuant to the Rules of Professional Conduct.

Gibson Dunn LLP appears to be able to act corruptly and with impunity across multiple courts sworn to uphold the Code of Conduct for U.S. Judges and Judicial Employees.

Gibson Dunn LLP lied about the Zuckerberg Information in multiple courts, including our *Leader v. Facebook* courts, thus engaging in deceit and collusion to hide the information.

Gibson Dunn LLP's own forensic expert Bryan J. Rose said that the Zuckerberg Information has suffered spoliation under Gibson Dunn's custody by at least the manipulation of computer clocks which will change file metadata.

FURTHER AFFIANT SAYETH NAUGHT



Michael T. McKibben

SWORN AND SUBSCRIBED before me, a Notary Public,
this 12th day of November 7, 2017.



Attached: **Exhibits A to R**

