

REAL PROPERTY LAW SECTION – Executive Committee
Wednesday, January 27, 2016
3:00 PM to 5:00 PM
New York Hilton - 1335 Avenue of the Americas
Rendezvous Room, Third Floor
New York City

1. Call to Order – The meeting was called to order by Leon T. Sawyko, Chair, at 3:00 P.M.

John Horan of the New York Bar Foundation gave a brief presentation emphasizing the good work the Foundation does throughout the state and made an appeal that all individuals on the Executive Committee make contributions.

2. Approval of the minutes of the Executive Committee meeting held at the Harvard Club on October 16, 2015 – Thomas J. Hall – Thomas J. Hall stated that the October 16, 2015 minutes were previously distributed to the Executive Committee and requested a motion that they be approved. The minutes of the October 16, 2015 meeting were unanimously approved.
3. Remarks of Chair – Leon T. Sawyko
 - a. The Chair advised that the Section has been asked to join in sponsoring a number of events including the Law Practice Management Program which is aimed at solo and small firm practices; we sponsored the Edith Spivak Symposium; and we have been asked to sponsor the Barrister’s Ball.
 - b. The Chair reported that our Section remains very active in a wide variety of endeavors and briefly discussed a number of the activities of the Section, including scholarships, student intern programs, CLE programs that are run by or sponsored by the Section, our active Committees – including those that are putting on CLE programs of their own as part of the annual meeting (Not-for-Profit, Landlord & Tenant, Condos & Co-Ops and Real Estate Financing & Bankruptcy), as well as the other Committees meeting during the Annual Meeting (Title & Transfer, Green Real Estate, Construction & Attorney Opinion Letters).
 - c. The Chair reported that the proposed amendments to the By-Laws have been put in place and will be voted on at the General Session meeting tomorrow. The amendments will also be voted on at the Executive Committee meeting of the NYSBA at roughly the same time.
 - d. The Chair reported that the reimbursement policy has been revised in accordance with the discussion and vote at our last meeting. The policy now provides that Executive Committee Members can now be reimbursed for up to \$750.00 of reasonable expenses for attending Executive Committee meetings (other than the January Annual Meeting

and the Summer Meeting) which take place more than 100 miles away. The policy also allows reimbursement of such expenses to Committee Chairs who travel more than 100 miles to attend their Committee Meetings.

- e. The Chair addressed the Committee Mission statements on the website and advised that a number of them are very outdated and in many cases are very dull to read. The Chair requested each Chairperson review their Committee's Mission statement and make any necessary improvements. The Chair suggested that they be written with an eye toward marketing the Committee to prospective members so that we can attract new membership.
 - f. The Chair discussed the problems created by "zombie homes," which is a problem throughout the state, including good neighborhoods. The Chair indicated that he was putting together a task force. Maria DeGennaro and Dan Webster of the Public Interest Committee have agreed to be part of the task force, as well as Richard Fries and Heather Rogers of the Real Estate Finance Committee. The Chair suggested that the task force consist of 6 to 8 members and be chaired by one member from the Public Interest Committee and one member from the Real Estate Finance Committee. The Chair noted that there was certain legislation that has been proposed by Attorney General Schneiderman regarding zombie homes as well as regulations that have been enacted by the NYS Department of Financial Services. The Chair suggested that the proposed legislation and the existing regulations are the types of things the task force should look at. Joel Sachs pointed out that many municipalities have enacted local laws to deal with issues relating to zombie homes.
4. Meeting Reports
- a. 2016 Annual Meeting – Mindy Stern gave an overview of the upcoming events including the Executive Committee dinner, the business meeting of the Section, the CLE program, the Committee lunch.
 - b. 2016 Summer Meeting – Trish Watkins reported that the Summer Meeting will be in Boston from July 14, 2016 to July 17, 2016. We will again be offering discounts for new attendees. The criteria for the discounts will be tightened up by requiring that anyone seeking to take advantage of the discount must either be a member of, or join, the section and NYSBA. There are also many people who have signed up for the 10% early registration discount, which was made available at last summer's meeting. The seminars are in the process of being arranged and the activities taking place during the meeting will be announced shortly.
5. Financial Report – Spencer Compton. The Section spent \$2,000 more than it took in over the past year. Despite this overage, the Section still has in excess of \$161,000.00 in surplus. In all other respects, the Section continues to stay within budget.
6. House of Delegates Report – Michelle Wildgrube reported that there were not any real topics of controversy but that the Section Caucus continues to

- talk about issues of membership. Joe Walsh mentioned that there was a resolution passed to support legislation to eliminate the “death gamble” for judges which addresses a problem under current law that if a judge dies while still in office, his or her survivors are severely disadvantaged by the amount of pension payout received. Joe also reported that the House of Delegates endorsed the Family Leave Act which would apply regardless of the number of employees a business has.
7. NYSBA Executive Committee Report - Ira Goldenberg reported that at the upcoming NYSBA Executive Committee meeting the topic of membership will be discussed to address the fact that there is declining membership, in general, in the NYSBA. Two major initiatives have been to attract law students and the expansion of the Municipal Law Section to include government employees. At the Section Delegates Caucus, there will be a discussion about sections with excessively large surpluses. All Sections have been encouraged to use their surpluses in a constructive way. The Chair inquired as to the efforts being made to attract law students. Ira reported that there are a variety of events promoting Membership in the NYSBA as well as offering free membership to students while in school and during their first year of membership after graduation. Ira noted that our Section’s internship program is an example of the type of efforts being undertaken not only by our Section but by other sections as well.
 8. Section Projects and Initiatives
 - a. Section Calendar – Gerry Goldstein requested that all committees advise Gerry of any upcoming meetings, events, seminars, etc. All such matters should be sent to Gerry Goldstein at his new email address: geraldgoldstein939@gmail.com. The Chair remarked that it is important for all to utilize the calendar in order for it to be a meaningful tool for the Section.
 - b. Task Force on Draft Insurance Department Regs – Gerry Antetomaso reported that a recent conference call was held with the task force and Kevin Kerwin of NYSBA. The result of that call was to do nothing until a new Superintendent of the NYS Department of Financial Services was appointed. Two days later, a new Superintendent was appointed. The task force will revisit the matter in the near future. The emergency regulations remain in place and there does not seem to be any urgency at this point, but the Task Force will continue to monitor the situation.
 - c. Scholarships– Mindy Stern reported that there were 9 applications for the Lorraine Power Tharp scholarship, which was a good result given the difficulty in getting applications in the past. Mindy believes that the decision to increase the scholarship amount as well as the increased efforts to get the word out (particularly by Andy Posil and Michael Stevens) to all of the law schools were instrumental in the improved results. Joel Sachs reported that there were similar good results with 8 excellent applicants for the Mel Mitzner scholarship. It was also reported that Roz Mitzner has made an additional

contribution to the Mel Mitzner scholarship and that Russell Tharp has made an additional contribution to the Lorraine Power Tharp Scholarship.

- d. Attorney Escrow Task Force – Ben Weinstock reported that the Attorney Escrow Task Force has been dormant as there does not seem to be much interest in the issue.
 - e. Amendment to POA Statute – Joe Desalvo reported that December 18, 2015 the Committee submitted its report to the Executive Committee of the NYSBA. In general, the consensus of the Committee is that the present statutory form is far too complex and far too wordy. The Committee made several suggestions, including: eliminating the Statutory Major Gifts Rider; recommending that the statute provide for “substantial compliance” rather than “strict compliance”; and a provision for recovery of attorneys fees if a bank refuses to accept a duly executed statutory form power of attorney. Attached to the Minutes is a copy of the Power of Attorney Task Force Report and the Proposed Amendments to the Statute (General Obligations Law Title 15). Sam Tilton noted that the report was on the agenda for the upcoming House of Delegates meeting.
 - f. Nominating Committee – David Berkey reported that the Nominating Committee nominated Gerry Antetomaso to be the next Secretary of the Section. The Nominating Committee also nominated the slate of District Representatives. All District Reps presently in place, except for the 5th and the 12th Districts have been re-nominated. Ann McGrath has been nominated for the 5th District. There is a vacancy in the 12th District and as of now, there is no nominee for that District.
9. Reports of Standing Committees
- a. Substantive Committees
 - 1. Attorney Opinion Letters – Greg Pressman reported that various efforts and reports over the years have been unsuccessful in establishing a “fair” opinion. The Committee is tentatively trying to get law firms to agree on the content of an opinion. If enough law firms can reach such an agreement perhaps the process of issuing Opinions in general can be simplified. The Committee intends to initially contact a small number of law firms, as a starting point, to get anecdotal information to see whether this approach may be feasible.
 - 2. Commercial Leasing – Bob Shansky reported that the Committee has planned a CLE eligible program, with ethics credit on Social Media and Commercial Leasing. The program is scheduled for late February or early March.
 - 3. Condemnation and Certiorari – Karla Corpus reported that the US Supreme Court has decided to take an eminent domain case dealing with the issues of unity of use and unity of ownership.
 - 4. Condos & Co-Ops - Steven Sladkus reported that they have an outstanding Committee meeting scheduled and that for future

Committee meetings they will be looking to have those meetings qualify for CLE credit. The Committee is very plugged in to the Attorney General's office and the Real Estate Finance Bureau; the Committee receives policy memos promptly after they are issued and shares them with the Committee members. Dale Degenshein reported that the City Bar has worked on a new Condominium Contract of Sale with the State Bar which is being published on the NYSBA website.

5. Green Real Estate – Joel Binstok thanked the Executive Committee for its support of the social / non-CLE meeting held on November 24th at the Architecture, Engineering and Planning firm of HLW, which attracted 35 people and included a presentation on some of the projects HLW is working on for companies like Google and UPS. The Committee is looking to put on a CLE in the spring with the Racer Trust which was established to deal with the Brownfields issues on properties owned by General Motors. The US Supreme Court recently issued an Opinion which held that utilities can pay big users of electricity for staying off of the grid. *Federal Energy Regulatory Commission v Electric Power Supply Association*, US Supreme Court, Slip Op No 14-840 decided 1/25/16. Nick Ward Willis reported that there is a proposal to amend building code to provide a 3 foot separation around the solar panels as a safety measure for firefighters. Two articles from the *Poughkeepsie Journal* discussing the new requirements are attached to the minutes.
6. Land Use and Environmental Law – Linda Margolin stated that the Committee will be looking to put a program on in the near future.
7. Landlord and Tenant – Peter Kolodny reported that the Committee will be having a CLE program on recent developments during the week of the Annual Meeting. Dan Blumenthal, who authors the McKinney's Commentaries will be speaking on recent cases, as will Joseph Condon, from Community Housing Improvement Program, who will be speaking on the Rent Act of 2015. Paul Gruber reported on a recent decision which has held that a Tenant who has rented his or her apartment out using AirBNB is subject to eviction. The City of NY is also bringing actions against owners for short term AirBNB rentals as violations of the Multiple Dwelling Law and the NYC Administrative Code. *42nd & 10th Assoc., LLC v Izeke*, 50 Misc 3d 130(A) (App Term, 1st Dept 2015). One property owner has been fined \$50,000 for two short term rentals and is now challenging the fine in an Article 78 Proceeding in Supreme Court, New York County. *City of New York v Pamela Equities Corp*, NYC ECB Appeal No 1500603.

8. Low Income and Affordable Housing – Richard Singer indicated that there was nothing to report but did indicate the need to appoint an upstate Co-Chair.
9. Not-for-Profit Entities and Concerns – Anne Copps reported that their upcoming CLE program would have a case law update, a speaker on “not in my backyard”, a speaker on turning around a troubled not-for profit, and an update on the Not-For-Profit Revitalization Act.
10. Professionalism – Nancy Connery reported that the Committee just circulated a summary of an Ethics Opinion that was supposed to go out when the communities were established on the website. A meeting is scheduled for February where the Committee is trying to get volunteers to summarize other relatively recent opinions and to post them on the Communities.
11. Public Interest – Maria DeGennaro reported that the Committee has been increasing its membership and has been holding quarterly meetings. The Committee has been working to engage law students in its activities. The Committee is also excited to take an active role in the recently created Zombie Homes task force.
12. Real Estate Construction – Brian Lustbader reported that Gavin Lankford has been appointed as the Upstate Co-Chair. The Committee has recently completed its review and analysis of its Rider to a construction contract between an Owner and Architect, with a Commentary (which is attached to these minutes)and is looking to get that posted to the website. The Committee is proposing that the State Bar endorse the NY City Bar’s report to modernize construction laws as they relate to public projects. A copy of the City Bar’s Report and a letter from NYCLA endorsing the report are attached to the minutes. As a future project, the Committee is looking to prepare a Rider to the AIA Design – Build Agreement.
13. Real Estate Financing – Richard Fries reported that the committee met earlier in the day and provided CLE credit at the meeting. Richard made the point that taking the extra effort to get the Committee meetings approved for CLE is not that difficult and that it seems to improve attendance at the meeting as well. Richard reported that Joe Forte spoke on Risk retention and High Volatility Commercial Real Estate regulations and their effects on lending; Larry Wolk spoke on Opinion Letters; Dan Zinman spoke on Bankruptcy Discharge issues; Richard Fries spoke on a number of recent cases. Richard summarized the cases that were discussed at the Committee meeting, which included: the “paper clip” case, which held that if an allonge is paper clipped to a Note, it does

not meet the UCC statutory requirement of being firmly “affixed” to the Note; (*HSBC Bank USA v Roumiantseva*, 2015 NY Slip Op 06315, July 29, 2015); two recent statute of limitations cases, both decided in October of 2015, which demonstrate that the filing of the complaint constitutes an acceleration of the debt, and if the complaint is subsequently dismissed and an action is not commenced within six years of the first complaint, the subsequent action is barred by the statute of limitations; (*U.S. Bank v. Parisi*, Supreme Court Suffolk County, Index # 66885/2014 decided 10/14/15 and *Ellery Beaver, LLC v HSBC Bank USA*, Supreme Court, Kings County, Index # 506700/2014, decided 10/9/15); and the Court of Appeals case of *Aurora v Taylor*, NY Court of Appeals, decided 6/11/15, which held that insofar as the issue of standing is concerned, the Plaintiff does not need to show how it came into possession of the original Note – it only had to demonstrate that it did in fact have such possession at the time of the commencement of the action. Finally, Richard reported that the Committee discussed the new Fin Cen rule on money laundering which requires title insurance companies to disclose the identity of Members in an LLC who are involved in an all cash purchase of residential real estate in excess of \$3 million in Manhattan and in excess of \$1 million in Miami. *See, FinCen Press Release* dated January 13, 2016 attached to these minutes.

14. Real Estate Workouts and Bankruptcy - Daniel Zinman elaborated on the case he reported on at the Committee’s earlier joint meeting with Real Estate Financing. In *Venture Bank v Lapidis*, 800 F3d 442 (8th Cir 2015), after a Borrower received a discharge in a Chapter 7 case, the Lender made an agreement with the Borrower that it would forbear from foreclosing on its third mortgage and agree to refinance its mortgage and the existing first and second mortgages if the Borrower would make certain payments. When the Borrower defaulted and the Lender sought to foreclose, the 8th Circuit held that the Lender had violated the Discharge. The Committee is planning to do a CLE in conjunction with the Cond & Co-Op Committee in the early spring, on Bankruptcy issues related to Condos and Co-Ops.
15. Title and Transfer – Gil Hoffman reported that the Assembly’s Judiciary Committee reached out to the RPLS for its comments on proposed legislation (Assembly Bill 8783-2014 and 7571-2015) that would authorize local water authorities to establish liens for water charges; the proposal would have created “secret” liens for a period of time which would have superpriority over all other liens except real estate taxes and

assessments. The T & T Committee worked on it and commented on the legislation indicating its opposition for a variety of reasons. The Committee's upcoming meeting will be discussing a number of cases. Gerry Antetomaso will be discussing Edwards v First American Corporation, *US Court of Appeals (9th Cir 8/24/15)*; a class action lawsuit concerning an exclusive agency between the title insurer and the title agent where the title insurer is a partial owner of the title insurance agency. Gill Hoffman will be discussing cases involving recent challenges to constructive notice. (including, Witter v Taggart, 78 NY2d 234 (1991); Mo Properties, LLC v Santa Monica Holdings, LLC, *Supreme Court, Orange County*, Index # 7588-2013, 9/21/15; and Butler v Mathison, 114 AD3d 894 (2nd Dept 2014)) Gil will also report on Champlain Gas & Oil, LLC v Willis, *Supreme Court, Clinton County*, decided 7/15/15, which illustrates the problems that can be created by ancient mineral rights conveyances. Gil suggested that the Champlain Gas case makes it appropriate for the Committee to re-consider a Marketable Title Act. ToniAnn Barone will discuss the Aurora Loan Services v Taylor case, *NY Court of Appeals*, decided 6/11/15. Joe DeSalvo will discuss Bank of America v Caulkett *U.S. Supreme Court*, Slip Op. No. 13-1421, decided 6/1/15. Karl Holtzschue will discuss his case law update of recent decisions. John Jones will discuss his proposal to create a comparative analysis on the various customs and practices for the practice of real estate in the different counties of the State.

b. Administrative Committees

1. Awards – Peter Coffey reported that Andy Herz will receive the Professionalism award at the upcoming Section Luncheon.
2. CLE – Joe Walsh reported that Larry Wolk co-chaired the Advanced Real Estate Transactions Seminar in December, which was very successful and that attendance at that program was back up to prior levels after having fallen off for the last two years. This Spring there is a program on Easements which the Section is sponsoring but otherwise has nothing to do with the program which is put on by the State Bar CLE Committee. Joe reported that going forward he is going to try to have our section kept in the loop anytime there is a real estate related seminar run by the State Bar CLE Committee. If we can see the agenda in advance, then our Section will at least have an opportunity to comment on it. The Committee is also working on a potential program on title examination issues. This program is being modeled after a similar program that Peter Coffey has been involved in with the Schenectady Bar Association.
3. Legislation – Sam Tilton advised that the Legislative Chart for the 2015/16 session will be up on the website. As of now, the chart is

a carry-over of the prior year's chart as there have been very few new bills introduced so far. The Committee will monitor all new bills and the Chart will be updated monthly. Sam also requested that if anyone is aware of any bills that are not on the chart, to please notify the Committee.

4. Membership – Harry Meyer reported that members of our Section (Harry Meyer, Marvin Bagwell, Lisa Stenson Desamours, and David Berkey) attended the State Bar's Diversity Trailblazer's Award Ceremony. Harry also expressed his thanks for the many innovative and hard working efforts of the District Representatives in their attempts to retain and attract new members as well as their efforts to encourage new members to become active members. Harry reported on the State Bar's trial program offer to all Members of the State Bar's Membership Committee that they can each get 25 Members to join the State Bar for free.
5. Publications – Marvin Bagwell reported that there are several articles lined up for the Spring/Summer issue of the Journal, including one on the new residential Condo Contract, with Commentary. The Committee would like to publish a tribute to Bill Colavito who has retired as Editor of the Journal after many years.
6. Student Affairs – David Berkey reported that Cardozo Law School has been added as a participating Law School in the Internship program effective this semester. The program now has 8 law schools and about 20 host law firms and is a continuing success. Ariel Weinstock reported that he and Spencer Compton attended a meet and greet event at Brooklyn Law School that has yielded some new interest from some Brooklyn Law School students. As this was a successful event, they would like to replicate it at other law schools. There is presently one scheduled for Cardozo. Shelby Green reported that Pace Law School is up and running in the Internship program as well. Shelby further reported that the ABA is considering a proposal to remove the prohibition against compensation in an internship program where the student receives credit.
7. Website and Electronic Communications – Susan Scharbach reported that the Committee's efforts on the website helped to increase the number of scholarship applications. Susan reported that the Communities on the website seem to be proceeding well and participation seems to be growing. The Committee would like to see some new blog postings on the website. Karl Holtzschue suggested that all approved forms be posted to the website.

10. Reports of District Reps

- a. 1st District – Nancy Connery indicated that the Committee Descriptions need work. Nancy requested that all Committee Chairs beef up the

descriptions so that people will want to join them. Nancy suggested the Committee descriptions could highlight things that the Committee has done and things that the Committee would like to accomplish.

- b. 2nd District – Lawrence DiGiovanna indicated that no formal events have been held but that all new members are contacted and encouraged to actively participate in the section.
 - c. 3rd District – Alice Breeding reported that she attended a reception for newly admitted attorneys in Albany. Alice is also working with the Young Lawyers to put together an event for the summer. Alice is also working with Albany Law School to set up a small group to “meet the real estate practitioner.”
 - d. 4th District – Michelle Wildgrube reported that she had an event together with a number of other Sections. Michelle also reported that we have a very good relationship with the young lawyers in her district and that she will be working to capitalize on that.
 - e. 5th District – No Report
 - f. 6th District – John Jones is working on a reference guide which describes the variations of local customs for real estate transactions in different areas of the state. He is going to work with Title & Transfer Committee for input as well.
 - g. 7th District – David Mineo reported for Scott Sydelnik that Scott spoke at a CLE for the Monroe County Bar Association. He included a short presentation on the benefits of belonging to the New York State Bar. He continues to welcome new members.
 - h. 8th District – 8th District – David Mineo reported that he conducted a CLE in Buffalo in conjunction with the NYSBA Pathways to the Profession program. It was a free one hour CLE on basic real estate transactions targeting law students and new attorneys. The Bar Association of Erie County has also asked that the Section again sponsor their Annual Real Estate Conference.
 - i. 9th District – Lisa Stenson Desamours reported that she continues to reach out to new members. She is also working on coordinating with Nancy Connery of the 1st District for a poetry reading at the Morgan Library. She is also considering setting up events in March or April at the Lincoln Center.
 - j. 10th District – Daniel Baker reported that they had a Holiday Reception with the young lawyers and the Nassau County Bar. They are looking to do more events with the Young Lawyers Committee.
 - k. 11th District – No Report.
 - l. 12th District – No Report
 - m. 13th District – Toni Ann Barone reported that she is working on networking with existing members and young lawyers.
11. Old Business – None
12. New Business – Mindy Stern announced that she will be switching firms after 30 years of practice at Schoeman, Updike & Kaufman LLP. Mindy will now be a partner at Schwartz, Sladkus, Reich, Greenberg & Atlas. Mindy wanted

everyone to know that her decision to switch firms had nothing to do with her relationship with Nancy Connery, who has always been and remains a dear friend.

13. Future Executive Committee Meetings
 - a. April 15, 2016 – Harvard Club, NYC
 - b. July 14, 2016 – Boston Long Wharf Club
 - c. October 14, 2016 – Harvard Club NYC
14. Adjournment – The Meeting was adjourned at 5:08 PM

Respectfully Submitted

Thomas J. Hall, Secretary

Attachments:

1. List of Members attending in Person
2. List of Members Attending by Phone
3. Power of Attorney Task Force Report
4. Proposed Amendments to Power of Attorney Statute (General Obligations Law Title 15)
5. Nominating Committee Report
6. Federal Energy Regulatory Commission v Electric Power Supply Association, US Supreme Court, Slip Op No 14-840 decided 1/25/16.
7. NY Weighs Rules that May Limit Rooftop Solar Panels, Poughkeepsie Journal, 1/10/16.
8. Error Clouds Fire-Safety Regulations for Solar Panels, Poughkeepsie Journal, 1/24/16.
9. 42nd & 10th Assoc., LLC v Izeki, 50 Misc 3d 130(A) (App Term, 1st Dept 2015)
10. City of New York v Pamela Equities Corp, NYC ECB Appeal No 1500603
11. Commentary to Owner's Rider to Agreement Between Owner and Architect for Projects of Limited Scope (AIA Form B014-2007)
12. New York City Bar Association Construction Law Committee Report, 21st Century Construction, 20th Century Construction Law, Update February 2014
13. New York County Lawyers Association, Letter in Support of ACBNY Report on Modernizing Construction Laws, dated January 29, 2015
14. HSBC Bank USA v Roumiantseva, 2015 NY Slip Op 06315, July 29, 2015
15. US Bank v. Parisi, Supreme Court Suffolk County, Index # 66885/2014 decided 10/14/15
16. Ellery Beaver, LLC v HSBC Bank USA, Supreme Court, Kings County, Index # 506700/2014, decided 10/9/15
17. Aurora v Taylor, NY Court of Appeals, decided 6/11/15
18. FinCen Press Release dated January 13, 2016 and FIN CEN Targeting Order dated 1/13/16.
19. Venture Bank v Lapides, 800 F3d 442 (8th Cir 2015)
20. Water Authority Liens -- Assembly Bill 8783-2014 and 7571-2015

21. Edwards v First American US Court of Appeals (9th Cir 8/24/15)
22. Constructive Notice Cases: Witter v Taggart, 78 NY2d 234 (1991); Mo Properties, LLC v Santa Monica Holdings, LLC, Supreme Court, Orange County, Index # 7588-2013, 9/21/15; and Butler v Mathison, 114 AD3d 894 (2nd Dept 2014).
23. Champlain Gas & Oil Co v Willis, Supreme Court, Clinton County, decided 7/15/15
24. Bank of America v Caulkett U.S. Supreme Court, Slip Op. No. 13-1421, decided 6/1/15.
25. Case Law Update (Karl Holtzschue)
26. Website and Electronic Communications Committee Report