

PREPARATION OF EMPLOYEES FOR  
STATEMENTS, INTERVIEWS, DEPOSITIONS,  
AND CONTROLLING SOCIAL MEDIA

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## REPTILE THEORY - GENERALLY

- ❖ Based on neurologist, Paul McClean's research performed in the 1960s
- ❖ Applied in legal filed by Don Keenan, Esq. and Dr. David Ball, a jury consultant, in "Reptile: The 2009 Manual of the Plaintiff's Revolution"
- ❖ Only takes a slip by a Defendant – conceding that he/she did not follow a "safety rule" – for tactic to lead to a large jury verdict

## REPTILE THEORY - GENERALLY

- ❖ In context of trucking accidents, particularly with the multitude of safety rules governing trucking industry, this theory is important to defense of claims against your company/driver
- ❖ Keenan and Ball have claimed that the strategy has resulted in more than \$4.6 billion in verdicts and settlements

## REPTILE THEORY: THE REPTILIAN COMPLEX

- ❖ 3 parts of the brain reflect stages of human evolution: reptilian (primitive survival based), paleomammalian (emotion, reproduction, parenting), and neomammalian (language, logic, planning)
- ❖ Focuses on the functions of the brain stem and the cerebellum (the oldest part of the brain)
- ❖ These portions of the brain thrive on survival instincts

## REPTILE THEORY: THE REPTILIAN COMPLEX

- ❖ Research shows that a reptilian brain maximizes “survival advantages” and attempts to minimize “survival danger”
- ❖ Conveys immediate danger of kind of thing Defendant did and how fair compensation can diminish danger within community
- ❖ Urges framing of case so it appears that every defendant chose to violate a safety rule

## HIGHLIGHTS AND GOALS OF THE REPTILE THEORY

- ❖ When a reptile brain senses danger, it goes into survival mode to protect itself and the community
- ❖ Focusing on the survival mode, Plaintiff's counsel will try to reach certain goals
- ❖ Obtain a winning verdict when logic or emotion might cause jurors to find against the Plaintiff
- ❖ Damages enhance safety and decrease danger

## HIGHLIGHTS AND GOALS OF THE REPTILE THEORY

- ❖ Courtroom is a safety arena
- ❖ Jurors are guardians of community safety
- ❖ Maximize the size of the verdict by encouraging the jury to think beyond the harm suffered by the particular Plaintiff and to look to the safety of the broad community
- ❖ Thus: safety rule + danger = reptile

## REPTILE THEORY AND TRIAL STRATEGY

- ❖ Key is to capitalize on the need of the reptilian portion of the human brain to avoid “survival dangers”
- ❖ Goal is to present case in a way that the jury identifies a danger to themselves or their community, regardless of the size, and for them to act on that instinct



# REPTILE THEORY AND TRIAL STRATEGY

- ❖ 4 phases of litigation where the “Reptile” is most commonly employed: depositions, voir dire, opening statements and during Defendant’s trial testimony itself
- ❖ Utilizes evidence and arguments to convince a juror that a Defendant was negligent and that this negligence threatens the juror’s community and family
- ❖ Seeks to empower the juror to prevent this purported negligence to protect the community as a whole
- ❖ Best way to protect the public from someone who violates a “safety rule” is with a large verdict for the Plaintiff

# REPTILE THEORY AND TRIAL STRATEGY

- ❖ At trial, most Plaintiffs' attorneys will not get out of safety zone, so not likely to ask Defendant a question that allows him/her to give a narrative response, such as to explain why they can't accept the basis "safety is best" type of Reptile statement.
- ❖ Skilled Plaintiffs' attorneys rarely will ask "W" questions such as what, why, etc. at trial since that gives the witness opportunity to talk their way out of whatever hole they may have dug for themselves if they have fallen into the reptilian trap
- ❖ Key to effective use of reptile strategy is to tie witness down in deposition, getting him/her to commit to a "safety" rule and giving him/her no chance to talk way out of that rule
- ❖ If Defendant will not concede these points in a deposition and provides a credible explanation as to why they can't, then Plaintiff's counsel is left without the distraction to use at trial and is left having to actually try the case on the facts alone.

# THE “SAFETY RULE”

- ❖ Usually established in deposition of Defendant
- ❖ Plaintiff’s counsel establishes a “safety rule” which Defendant violated, but if followed would have avoided harm
- ❖ Must have the following:
  1. Rule must prevent danger
  2. Must protect people in several situations, not just someone in Plaintiff’s position
  3. Clearly written
  4. Explicit as to what must be done and what must not be done
  5. Practical and easy to follow
  6. Must be one that Defendant must either agree with it or will seem stupid, careless or dishonest for disagreeing with it

# BIG PICTURE SAFETY PRINCIPLES

- ❖ Safety is always top priority
- ❖ Danger is never appropriate
- ❖ Protection is always top priority
- ❖ Reducing risk is always top priority
- ❖ Sooner is always better
- ❖ More is always better

# KEY BUZZ WORDS OR PHRASES

- ❖ Witness should be on the alert for certain words or phrases
- ❖ “Safety”, “danger”, “all reasonable steps”, “avoid danger”, “top priority”, and “needlessly endanger”
- ❖ These words or phrases are an attempt by Plaintiff’s counsel to replace concepts like “standard of care” and “ordinary care” with a broader more liberal definition of what might constitute an act of negligence

## “SAFETY RULE” EXAMPLES

- ❖ Hypothetical/umbrella-type rule – “Motorist not allowed to needlessly endanger the public”
- ❖ Then establish a case-specific rule directly attributable to conduct of Defendant – “If a truck driver fails to adhere to federal motor carrier safety regulations, he has needlessly endangered the motoring public”
- ❖ Can be done in written discovery (such as Requests for Admission), in depositions, or both
- ❖ In either situation, the goal of the admissions is to establish first that a Defendant agrees with a safety rule and second it controls verdict because a violation endangers all

## GENERAL EXAMPLE OF LINE OF QUESTIONING

- ❖ Q: You've been driving for a long time, correct?
- ❖ Q: One of the rules of the driving is that you must pay attention at all time, right?
- ❖ Q: You must maintain control of your vehicle, right?
- ❖ Q: Why are these rules important?
- ❖ Q: Because people can get hurt if these rules aren't followed?
- ❖ Q: These rules are in place to protect everyone on the roadway, right?
- ❖ Q: They protect you?
- ❖ Q: They protect your family members?
- ❖ Q: They protect everyone in the community, right?
- ❖ Q: And you agree that if a driver fails to follow these rules and causes an accident, then the driver is responsible for any harms and losses caused as a result?

# CASE SPECIFIC EXAMPLE OF QUESTIONING

- ❖ Rush v. Saiber, *et al.* – video excerpts



## EXAMPLES OF QUESTIONING IN TRUCKING ACCIDENT CASES

- ❖ Counsel must prepare defense witnesses early to respond to reptilian-styled questions, including truck driver, safety manager, corporate representative and expert witnesses
- ❖ Some examples of questions that might be asked include:
- ❖ As a commercial truck driver, there are specific rules you must follow, correct?
- ❖ Like the federal rules governing hours of service?
- ❖ And you agree the hours of service are in place to ensure the safety of everyone on the roadway, right?

## EXAMPLES OF QUESTIONING IN TRUCKING ACCIDENT CASES – CONT.

- ❖ They are intended to prevent fatigued drivers from operating commercial vehicles?
- ❖ Because fatigued drivers operating commercial motor vehicles is a safety concern, right?
- ❖ Another rule requires preventative maintenance of commercial motor vehicles, correct?
- ❖ The rules require daily inspections of the truck and trailer, right?
- ❖ Inspections of things like brakes?

## EXAMPLES OF QUESTIONING IN TRUCKING ACCIDENT CASES – CONT.

- ❖ These rules help identify equipment that needs attention or repair, right?
- ❖ Because all equipment wears out over time?
- ❖ And commercial trucking equipment can be especially dangerous if not properly maintained?
- ❖ These rules protect your safety, don't they?
- ❖ They protect people like the plaintiff, right?
- ❖ They protect the safety of the community, right?

## EXAMPLES OF QUESTIONING IN TRUCKING ACCIDENT CASES – CONT.

- ❖ And you agree that if someone violates those rules and causes an accident, then they should be held responsible for their actions?

# WHY IS IT IMPORTANT TO PREPARE WITNESSES IN ADVANCE OF DEPOSITION

RUSH v. WHITEMAN, et al. LEANNE SAIBER 11/05/2015  
87

1 ERRATA-SIGNATURE PAGE  
2 RUSH VS. WHITEMAN, ET AL.  
3 CASE NO. 14-C-595  
4 DEPOSITION TAKEN NOVEMBER 5, 2015

5 Page 31 Line 9-12 :  
Now Reads: "I mean... to avoid it."  
Should Read: No, I was at the top of the hill & saw faint red lights at the bottom. I hit my brakes, but hydroplaned  
Reason for Change: instead of stopping, so I kept turning my wheel harder to the right to get off the road.

6 Page 31 Line 16 :  
Now Reads: "Yes"  
Should Read: Yes, because I was hydroplaning & at first I couldn't get off the road by merely turning the wheel  
Reason for Change: clarification gently.

7 Page 32 Line 23-25 :  
Now Reads: "I don't... anything."  
Should Read: I don't think I did, but can't remember clearly, therefore am relying on the police report which states I  
Reason for Change: did not hit any other vehicles to confirm that I didn't. clarification

8 Page 33 Line 3-4 :  
Now Reads: "Again... I--"  
Should Read: I don't have a clear recollection, so am relying on the police report stating that I did not hit any  
Reason for Change: clarification other vehicles.

9 Page 33 Line 8 :  
Now Reads: "No... wrong"  
Should Read: I can't remember, therefore I must rely on the police report.  
Reason for Change: clarification

10 Page 33 Line 18 :  
Now Reads: "I guess... yes."  
Should Read: I don't think I hit anything but the ground while rolling, so I am relying on the police report which  
Reason for Change: clarification states I did not hit any other vehicle.

11 Page 39 Line 3 :  
Now Reads: "It looks like it"  
Should Read: There's damage, but I have no way of knowing what happened to agree with you.  
Reason for Change: clarification

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22 Under penalties of perjury, I declare that I have  
23 read the foregoing transcript and that the facts stated  
in it are true.

24 12/15/2015  
Date

25 Leanne Saiber  
LEANNE SAIBER

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4 Page 39 Line 12 :  
 Now Reads: "~~Yes... no.~~"  
 5 Should Read: There's damage, but I have no way of knowing the significance of it to agree with you  
 Reason for Change: Clarification

6 Page 42 Line 14 :  
 7 Now Reads: "Yes"  
 Should Read: It appears to be, but I did not get to see any car at all after the accident. therefore can not  
 8 Reason for Change: Clarification know for sure.

9 Page 43 Line 16-17 :  
 10 Now Reads: "I mean... that."  
 Should Read: No, I don't agree because I don't think it struck anything other than the ground while rolling.  
 Reason for Change: Clarification

11 Page 43 Line 21-23 :  
 12 Now Reads: "No... know."  
 Should Read: There could be a number of explanations for the damage sustained: from rolling down a ditch, from  
 13 Reason for Change: the towing to move it & put it back on its wheels (how you said), or from the sign shown in the  
Clarification pictures,

14 Page 44 Line 7 :  
 15 Now Reads: "No."  
 Should Read: I don't know for certain, but there could be a number of possibilities to how the damage might h  
 Reason for Change: Clarification happened.

16 Page 45 Line 9 :  
 17 Now Reads: "No."  
 Should Read: I don't have a clear memory, but I know my car rolled then caught fire because it was stated in  
 18 Reason for Change: Clarification police report.

19 Page 45 Line 15 :  
 20 Now Reads: "I don't remember."  
 Should Read: I never thought I struck any other vehicles, & am confirmed by the police report which states I  
 21 Reason for Change: Clarification not collide with any other vehicles.

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4 Page 45 Line 19 :  
5 Now Reads: "No."  
6 Reason for Change: No personally I didn't see the damage or know how it occurred, but there's a number of possibilities to how it might have happened, I'd assume the damage done to my car was caused by rolling + catching fire like stated in the police report.  
7 Page 51 Line 22 :  
8 Now Reads: "No."  
9 Reason for Change: I might have, but do not remember who it was or the specific conversions well enough to be 100% sure.  
10 Page 51 Line 25 :  
11 Now Reads: "No."  
12 Reason for Change: I definitely don't think I spoke to anyone at the hospital, I might have spoke to an officer at the scene before taken to the hospital but can't remember details from that long ago to give anything other than rough guesses/estimates.  
13 Page 52 Line 17 :  
14 Now Reads: "Not... remember"  
15 Reason for Change: I might have, but can't remember well enough to say yes or no for sure.  
16 Page 55 Line 16 :  
17 Now Reads: "I think... Yes"  
18 Reason for Change: I had conversations with the EMT <sup>rescue</sup> workers, but they were asking mostly medical questions + I can't remember any specifics from that very eye to give certain questions or answers.  
19 Page 56 Line 12 :  
20 Now Reads: "I feel... remember"  
21 Reason for Change: can't remember any specific conversations, but I think they were more concerned about my physical conditions/injuries during the rolling + how badly I felt afterwards, not the accident or anything that happened prior.  
22 Page 58 Line 12 :  
23 Now Reads: "Not that I can remember"  
24 Reason for Change: No, my men spoke to some hospital employees about that area being a hazard because of the drainage ditch that commonly overflowed, but we left almost immediately after they got there to drive back to PA since I had been there for so long waiting for them to arrive.

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4 Page 58 Line 21-22 :  
 Now Reads: "~~Not... drive~~"  
 5 Should Read: No longer thought I hit any other vehicles, so I wouldn't have told them or anyone else that I did  
 Reason for Change: Clarification

6 Page 59 Line 6-7 :  
 Now Reads: "~~No... that~~"  
 7 Should Read: No, I wasn't using my phone in anyway when it happened so I wouldn't have told anyone that.  
 Reason for Change: Clarification

9 Page 64-65 Line 29+1 :  
 Now Reads: "~~I don't... remember~~"  
 10 Should Read: I don't remember those being a car in front of me, I was driving so slow though because I did barely see anything  
 Reason for Change: the rain, so I doubt I could have caught up with anyone etc.  
 Clarification

11 Page 66 Line 12-13 :  
 Now Reads: "~~I -- don't know~~"  
 12 Should Read: I can't remember to say for certain, but think as I was hydroplaning I kept turning the wheel, & when my tires  
 Reason for Change: caught the road sideways it tipped me & rolled down the ditch on the right side of the road.  
 Clarification

14 Page 67 Line 3-5 :  
 Now Reads: "~~I -- remember~~"  
 15 Should Read: I can't remember to say for sure, but I thought I rolled & am relying on the police report which states I  
 Reason for Change: did.  
 Clarification

17 Page 73-74 Lines 25+1-3 :  
 Now Reads: "I actually... herniated discs."  
 18 Should Read: I didn't receive any tests or MRI's at Ruby Memorial Hospital that diagnosed anything because on the surface it  
 Reason for Change: appeared to be just a few scratches & bruises, but later MRI's showed severe information in my neck  
 Clarification: shoulders & I was diagnosed with 3 herniated discs in C5, C6, & C7.

19 Page 74 Line 6-9 :  
 Now Reads: "~~I'm not... the accident --~~"  
 20 Should Read: I did basic therapy treatments immediately after the accident, although I've had to increase the intensity of  
 Reason for Change: of treatment methods as my injuries continued to become worse with time.  
 Clarification

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4 Page 76 Line 7 :  
Now Reads: "The Hienics. They're three brothers."  
Should Read: "It was the Hienics family's cabin, they're a long-time family friends since my brother went to  
Reason for Change: with one of the 3 brothers."  
Clarification

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6 Page 76 Line 13-14 + 16-17 :  
Now Reads: "Justin - Adam." + "I can't say."  
Should Read: "Justin, was the youngest brother + was a grade ahead of me in high school, Adam, the middle of  
Reason for Change: attended substitute with my brother, + Brad, the eldest brother."  
Clarification

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9 Page 77 Line 2-5 :  
Now Reads: "A couple ... therapist."  
Should Read: "I went to many different therapy centers for treatment, the most recent is Donner Physical Ther  
Reason for Change: which I was referred to by Dr. Melkey, D.O. at East Coast Orthopedics who specializes  
Clarification: before that I had a physical therapist who came to my home for treatment. I also currently see 2 other  
Dr. Quinlan (Upper limb) Dr. Bradwin (Chiro, Neuro)  
Dr. Gungor (Chiro) Dr. Gungor (Chiro)  
Dr. Gungor (Chiro) Dr. Gungor (Chiro)

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11 Page 78 Line 6-7 :  
Now Reads: "I don't ... remember."  
Should Read: "My current family Dr. is Dr. Benchik, M.D., but my family doctor growing up was Dr. Anderson,  
Reason for Change: Chiro, D.C. in Denver, PA."

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14 Page 80 Line 10-16 :  
Now Reads: "I don't ... there a lot."  
Reason for Addition: to expand upon in detail involved in the accident should take action  
me to force them to fix the drain there because they consistently tow merged/totaled vehicles from that area w/

15

16 Page 81 Line 13-15 :  
Now Reads: "I said ... a while."  
Reason for Change: to visit with long-time family friends that I hadn't seen since high school, I didn't know  
Clarification: to expect, but the last time I visited we played on the water (skiing, wake sur  
boarding, kayaking, fishing, etc.) even though that was years + years ago. I assumed  
our ages

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19 Page 81 Line 19-21 :  
Now Reads: "No ... weekend."  
Should Read: "No, the last time I was there was way back in high school."  
Reason for Change: Clarification

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4 Page 81-82 Line 35-36:  
Now Reads: "I mean... hung out."  
5 Should Read: "I never made it there, so I have no way of knowing what was going on there."  
6 Reason for Change: Clarification

7 Page 82 Line 4:  
Now Reads: "Yeah, I think so."  
8 Should Read: "I wasn't sure who was even going to be there, let alone what people were doing, so I don't know."  
9 Reason for Change: Clarification

10 Page 82 Line 8-9:  
Now Reads: "I mean... have."  
11 Should Read: "No, I don't drink at all, & I never made it there so I don't know what the agenda was for the weekend."  
12 Reason for Change: Clarification

13 Page 82-83 Line 34, 35-1, 2:  
Now Reads: "I said... that day."  
14 Should Read: "I'm prescribed Adderall, but it was too long ago to remember if I took it that day."  
15 Reason for Change: Clarification

16 Page 83 Line 11-12:  
Now Reads: "No... I'm sorry, I..."  
17 Should Read: "No, I don't remember them deploying, nor did I have any significant indicators on my face or  
18 Reason for Change: that that airbags commonly leave. But again, I'm relying on the police report for facts/details of what happened, & I don't think they stated that airbags were employed."

19 Page 85 Line 11:  
Now Reads: "Yeah, for the most part, yes."  
20 Should Read: "Yeah, for the most part. Following this experience definitely tore me up, but I felt a little better at times  
21 Reason for Change: when I was really emotional & breaking up. Then if I addressed a question that she didn't like the answer to, she got kinda aggressive & kept asking the same question & guessing what I responded in the way she wanted. But I guess that's how depositions are done because this was my first experience with anything like this."

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# HOW TO DEFEND AGAINST THE REPTILE THEORY

- ❖ Object on the basis that Plaintiff is utilizing the “golden rule” argument improperly
- ❖ Evidentiary Rules 401 and 403 – object to any implication that damages be awarded to protect the community at large
- ❖ Object to prior bad acts under Rule 404 if suggested
- ❖ Attack Plaintiff’s strategy during closing
- ❖ Deposition defense strategies

# DEPOSITION DEFENSE STRATEGIES

- ❖ What do you tell clients when Plaintiff's counsel asks about "safety" and "preventing danger"
- ❖ Honest answer is always "it depends" because every situation, event, incident and moment in time is different than all others
- ❖ "It depends on circumstances", "not necessarily in every situation", "not always", "sometimes that is true, but not all the time", "it can be in certain situations"
- ❖ Must be prepared to explain circumstances under which reptilian statement does not apply

# DEPOSITION DEFENSE STRATEGIES

- ❖ Avoid conceding any hard and fast rules
- ❖ Do not agree with any reptilian statement across the board, no matter how common sense it appears
- ❖ Example of cost/benefit argument – to do everything humanly possible to protect against every conceivable scenario not possible because would diminish resources, increase cost
- ❖ Example – auto industry not spending money to fix defects
- ❖ Counter to reptile – show how taking all additional steps Plaintiff contends should have been taken will have negative or expensive impact on community or society as a whole
- ❖ What would a product cost a consumer if manufacturer had to design in manner suggested by Plaintiff

## ANOTHER DISTRACTION OF REPTILE THEORY

- ❖ Attempt to get something into evidence to inflame jury
- ❖ Defendant asked if remorseful for accident or whether they tried to find out how hurt Plaintiff was
- ❖ Relevant facts are event or accident and those events leading up to it
- ❖ Once accident occurred, nothing after that fact – whether Defendant tried to contact Plaintiff or not, tried to apologize or not – is legally irrelevant

## ANOTHER DISTRACTION OF REPTILE THEORY

- ❖ Ball and Keenan teach Plaintiff's counsel to argue to jury that all Defendants are doing is trying to "protect their money" by defending case and that if as concerned about Plaintiff as about their money then accident might not have occurred
- ❖ May not be able to preclude questions during deposition, but prepare clients to be ready for them
- ❖ Then, counsel should file a pretrial motion to preclude Plaintiff's counsel from introducing this evidence

THANK YOU



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