

NALS OF MICHIGAN

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DEFAMATION IN THE SOCIAL MEDIA AGE

By: Teresa Garber, PP, CLP
President, NALS of West Michigan

My office receives a lot—and I do mean a lot—of phone calls from individuals looking for a lawyer to help them prosecute a defamation claim, mostly from social media posts. With the rise of social media, these types of claims are becoming more and more prevalent. What is defamation? What remedies are available for a victim of defamation? Can defamation via social media be stopped?

Let's start with the basics. Here are the definitions of *defamation*, along with *slander* and *libel*:

- *Defamation*: the act of harming the reputation of another by making false statements to a third person.
- *Slander*: a defamatory statement expressed in a transitory form, especially speech.
- *Libel*: a defamatory statement expressed in a fixed medium, especially writing, but also a picture, sign, or electronic broadcast.

Black's Law Dictionary (7th ed.)

Essentially, defamation is the actual false statement; slander and libel are how the false statement is delivered. Generally, if the statement is verbally made, it is slander; if the statement is made in writing, it is libel.

A victim of defamation must prove (1) the statement made concerning the victim is false, (2) the statement is an unprivileged communication to a third party, (3) there is fault of at least negligence by the publisher of the statement, and (4) there is actionability of the



statement or existence of special harm (defamation *per se*) caused by the publication. Michael Dauphinais, "Michigan Defamation Law and Businesses," April 24, 2019, <<http://mbelr.org/michigan-defamation-law-and-businesses/>>, accessed August 16, 2019. In short, the statement is a lie about the victim intentionally made to another person that can be seen or heard by anyone else and damaged the victim. When a statement is defamatory *per se*, it is false on its face (for example, when someone says that Frank is a thief when he is not). Defamation *per se* not only damages tangible things of the victim, such as property, business, etc., but also damages the victim's reputation and feelings (special harm). When there is defamation *per se*, the victim only needs to prove the first three elements of defamation. In Michigan, defamation *per se* only applies to statements made about a person's alleged lack of chastity, immorality, or criminal conduct. It does not apply to business reputation, etc. "Michigan Defamation Law: MCL 600.2911---Libel or Slander," December 7, 2011, <<https://www.traverselegal.com/blog/michigan-defamationlaw/>>, accessed August 16, 2019. Businesses must prove a causal link between the defaming statements and the damage the business suffered. The defamation can only prevent customers from dealing with the business. A business's reputation cannot be defamed. Dauphinais, "Michigan Defamation Law and Businesses."

The damages that can be sought are for actual damages suffered regarding the victim's property, business, trade, profession, occupation, or feelings. This includes injury to reputation, mental suffering, and humiliation, but must be established with evidence. "Michigan Defamation Law: MCL 600.2911---Libel or Slander." However, in cases of libel, prior to filing an action, if the victim gives notice to the defendant to publish a retraction with a reasonable time to do so, but the defendant refuses, then the victim can seek exemplary and punitive damages on top of actual damages. MCL 600.2911.

When it comes to social media, people seem to be less constrained in what they post than what they say directly to another person. Can you be sued for what you post on social media? According to Nancy Costello, a law professor at Michigan State University, it depends. She says that if a person posted a lie about another person on Facebook, the victim could sue. Arielle Hines, "Law professor: Be careful what you post on social media," July 12, 2017, <<https://www.incomediary.com/social-media-mistakes>>, accessed August 16, 2019. Just tacking on the phrase "in my opinion" does not protect the publisher. However, certain statements are not defamatory. In Professor Costello's example, if you say that Frank is a thief when he is not, it is defamatory. However, if you say that Frank is ugly, it is more cyber bullying, which is not necessarily defamation. Also, a statement can be protected if it is a criticism of decisions another person makes or if the person is broadly criticizing something. Professor Costello states that criticisms of public officials, such as the mayor or even the President of the United States, are protected under the United States Constitution. And don't think posting things anonymously will save you. A victim can subpoena a social media outlet to reveal your name. Social media platforms can trace pseudonyms and fake names to the actual person making the defamatory statements.



The worst part about social media is that it is very easy to defame another person, even if you did not intend to go that far with your statements. Social media posts are instant, meaning not only that your post is immediately up and available for all to see, but we tend to be much more relaxed and very informal when we post. That means we, as social media posters, are not consciously paying attention to our live videos or the words that we are typing. One misstep and you could be sued for what you post. To avoid defamatory posts to social media, here are some tips that always bear repeating:

- **Never post in anger.** Count to 10, take a walk, take a deep breath . . . just get rid of the anger before you make a social media post.
- **Check your facts.** Research is your best protector.
- **Make the context of your post clear.** Sarcasm isn't always understood to be funny to others.
- **Be careful with hashtags.** Not everyone thinks they're funny.
- **Avoid modifying photos and videos.** As much fun as Photoshop is to use, as stated above, images can be defamatory as well.

Ruth Awad, "3 Social Media Mistakes That Could Get You Sued," <<https://www.incomediary.com/social-media-mistakes>>, accessed August 16, 2019.

In short, the best practice is, if you would not say it in front of your grandmother, do not post it on social media.

Western District of Michigan News

Electronic Communication Devices in Courtrooms (updated)
Published August 13, 2019 by Chief Judge Robert Jonker

MEMORANDUM

TO: The Registered CM/ECF Users
FROM: Chief Judge Robert Jonker, Western District of Michigan
DATE: August 13, 2019
RE: Electronic Communication Devices in Courtrooms

Local General Rule 4.3(d)(i) requires that all "electronic communication devices" in a courtroom "be in the off position at all times, unless the presiding judicial officer gives permission for use of the device." This applies to the laptops, phones, tablets and other electronic devices that lawyers may bring into the building under Local General Rule 4.3(c)(i), as well as to anyone else permitted to bring an electronic device into the courtroom.

This Local General Rule is increasingly honored in the breach. Lawyers routinely leave electronic devices on while in the courtroom without seeking or receiving the permission of the presiding Judicial Officer. Sometimes this leads to open disruption when a phone rings, a



notification sounds or an alarm triggers. But even if the electronic device is in silent mode, as long as it remains "on" in the courtroom, rather than "off," there is a violation of General Local Rule 4.3(c)(i).

The original concerns that drove adoption of the Rule are still valid. In fact, in some ways, the concerns are even greater now with more sophisticated devices. Concerns go well beyond the risk of open disruption and include: 1) the risk of inadvertent or intentional recording of courtroom proceedings; 2) the risk of inadvertent or intentional transmission of courtroom proceedings; 3) the risk of inadvertent or intentional photography of persons or proceedings in the courtroom; 4) the risk that electronic devices in the courtroom will be connected to the internet and inadvertently or intentionally provide unauthorized access to courtroom proceedings, or even potentially trigger a harmful device inside the courtroom.

The first point of this communication is to remind the practicing bar of the Local General Rule and of this Court's intention to enforce it as written as long as it remains in effect. Any lawyer who wants to use an electronic device in the courtroom must seek and receive permission from the presiding Judicial Officer to do so before turning the electronic device on in the courtroom.

The Court recognizes that electronic devices have become integrated with daily life and law practice in a way that makes access to those devices important to effective advocacy. Indeed, the Court has required electronic presentation of evidence for years. Moreover, access to calendars is often an essential part of an effective Rule 16 conference. And access to digital research and file materials may often be a practical necessity. Every Judicial Officer in this Court recognizes these legitimate needs for electronic devices to be "on" in the courtroom. Most have permitted use of electronic devices in the courtroom for one or more of these purposes.

The second point of this communication is to solicit comments and suggestions from the practicing bar on whether and how the Local General Rules should be amended to balance these competing considerations. The Court wants to prevent the risk of unauthorized recording and transmitting of court proceedings, as well as other risks that unauthorized access to the internet from the courtroom might create. But the Court recognizes that lawyers routinely will need access to data on their devices that requires those devices to be "on."

There is no concrete proposal for consideration at this time. If and when there is, the Court will follow its normal procedure for notice and comment on proposed rules. At this time, though, the practicing bar is invited to provide written comments and suggestions for the Court's consideration of these important and eminently practical issues. To ensure full consideration, written comments and suggestions should be submitted by electronic mail to ecfhelp@miwd.uscourts.gov not later than September 30, 2019. Unless and until the Local General Rule changes, lawyers must comply with it and expect the Judicial Officers to enforce it.



ECF Help Desk
Western District of Michigan
(800) 290-2742
(616) 456-2206
ecfhelp@miwd.uscourts.gov

NALS of MICHIGAN NEW MEMBERS

Please welcome our new members:

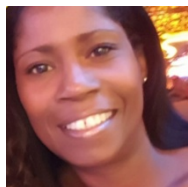
Katrina Harden (NALS of Lansing)
Hillary Carroll (GTALP)
Dena Major (NALS of Detroit)
Zack Hunkins (NALS of Greater Kalamazoo)



New Member Welcomes: Match a Name With a Face*

This member is family oriented with four children and 7 grandchildren. Her interests include volunteering and spending time with family and friends. She loves travelling and if money were no object she would travel the world. This member is currently a legal assistant working in corporate, procurement and licensing, but her interests also lie in real estate. She currently works for Ally Financial in Detroit. Her recent accomplishments include:

- 2018 LEADing the Way Award winner – Ally’s annual, CEO sponsored enterprise-wide recognition program designed to recognize employees whose leadership and performance consistently role-models Ally’s LEAD core values.
- 2018 Datafest winner – The Insurance group hosts an annual competition in which employees (nationwide) were challenged to use company and industry data to develop a business plan on what can be improved in Ally’s business. Streamlining the GAP Claims process was our team’s idea.
- Black/African American Employee Resource Group (ERG) – Community Outreach Pillar, Co-Chair
- Women’s ALLYs, Pride ALLYs, Veteran ALLY’s ERG member



Please welcome *Dena Major of NALS of Detroit*; especially on Facebook and LinkedIn!



Our next member is from NALS of Kalamazoo. She also is family oriented and the baby of the family with four older brothers (two sister-in-laws, five nieces, and three nephews). She is a dog lover, but does not yet own one. She loves reading, biking and finding new establishments that serve food, and she looks forward to traveling—someday to every state in the United States. She collects figurine elephants, books, and necklaces. The area of law she works in as legal assistant is what interests her most, criminal law, at Levine & Levine.



Please welcome *Lois Umphrey of NALS of Greater Kalamazoo*; especially on Facebook, LinkedIn, and Instagram!

This member also happens to be from NALS of Kalamazoo, who also comes from a large family (one brother and one sister). As a family they love traveling together. One day this member hopes to go to Europe and/or Greece. She loves spending time on the lake in the summer and snowboarding in the winter. This member is currently an intern, working side by side with an attorney and a legal assistant. At Levine & Levine she works in family law—and loves it—but her current interest, and major, is Business Law.



Please welcome *Natalie Hood of NALS of Greater Kalamazoo*; especially on Facebook, LinkedIn, and Instagram!

*These responses were compiled from the answers of the returned New Member Interest Surveys.

NALS of Michigan Membership Campaign

REMINDER: Accomplishment points are due to Heidi Hopper, PP, PLS (hhopper@fosterswift.com) by the 5th of each month. The membership campaign is full of opportunities to further your member benefits and get to know your NALS pals. If you need additional information on the membership campaign, please reach out to Heidi Hopper.



NALS of Michigan 2020 Annual Meeting

The NALS of Michigan's 59th Annual Meeting will be at the Bavarian Inn in Frankenmuth from April 16-18, 2020. If you are interested in volunteering your time and talents to help with the planning of this meeting, please contact co-chairs, Teresa Garber, PP, CLP (tgarber@silvervanessen.com) and Lynn Philp (lphilp@wnj.com).



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Willkommen
!



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NALS
MEMBER

NALS OF MICHIGAN

APRIL 17-18, 2020

BAVARIAN INN, FRANKENMUTH, MI

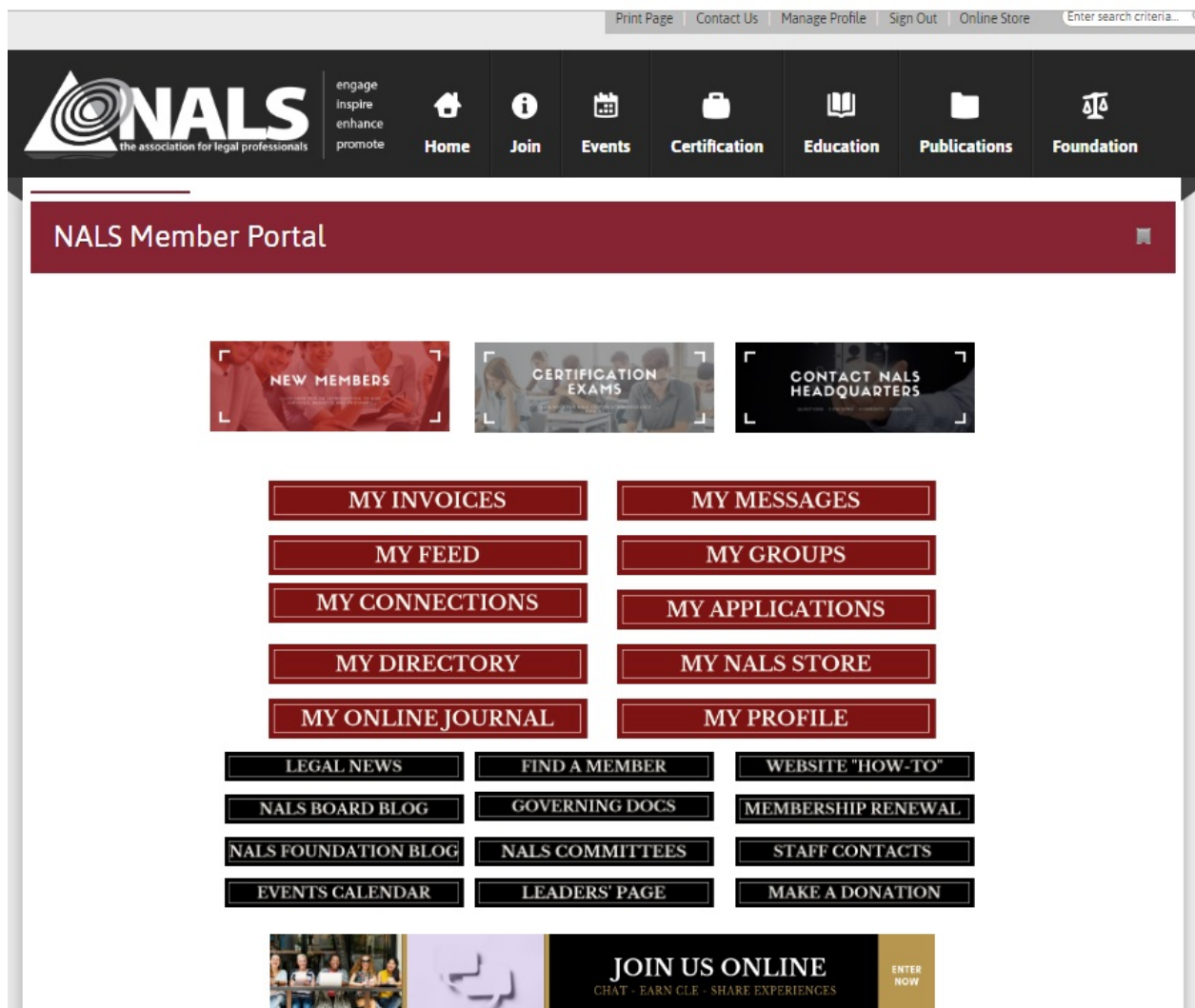
59TH NALS OF MICHIGAN ANNUAL MEETING
AND EDUCATION CONFERENCE



NALS Member Portal

By: Paula Steffey, PP, CLP-SC, CWCP

If you haven't done so recently, you will want to check out the Nals.org website, specifically the new Member Portal. This is how you will receive communications from the national Board of Directors, the staff members at the Resource Center, the Board of Directors for NALS of Michigan, and even your local chapter. The new Member Portal is easy to navigate and has everything you need at your fingertips. Below is a screenshot of what it will look like once you log into your Nals.org account and click on "Member Portal".



If you get an email from dircomm@nals.org that says “NALS...the association for legal professionals – You have received a new message” then you can either click on “Take me to my inbox” or you can log in directly to the Member Portal and click on “My Messages”. This is your NALS inbox where you can see all of your messages.

You can also access your Online Journal, which is where you can upload your CLE certificates and print transcripts of your total CLEs. You can also access the NALS directory where you can look for any NALS member—even those out of state. You can also “connect” with other members by going to the “My Connections”. And one of the best parts of the Member Portal is the “My Feed” which is the NALS social feed. You can see announcements about upcoming events, quizzes, news articles and so much more.

The “My Profile” tab is of utmost importance. This is where you update your professional and personal information such as address, phone number and email address. When NALS sends out your renewal invoice they send it to the address (and email address) that you have listed in your profile. When NALS of Michigan sends out a message to all members, the email notification automatically gets sent to the email address you have listed in your profile.

There is so much information to see in the Member Portal that I would highly recommend you log in and check it out for yourself. Are you unsure how to log in? Go to www.nals.org. Click on the Member Portal and it will bring you to the Member Login page. To gain your initial login details, contact NALS Membership Services Manager at Membership@NALS.org.

NALS of Michigan Technology Update

The NALS of Michigan website is up on the new platform. Please take a moment to check it out (www.nalsofmichigan.org) and obtain your membership approval to enter the members/current members/forum page.

NALS of Michigan Fall Membership Meeting

Save the date....the fall membership meeting will be held on Saturday, October 19, 2019 in Lansing. A tour of the Capitol will be included. Stay tuned for more details.



Chapter Happenings

NALS of Detroit

President: Gayle Lawson

Email: gaelawson@gmail.com

Fall CLE

Wednesday, September 18, 2019 at 5:30 p.m.

Intellectual Property Law; presented by Vito Ciaravino, Esq.

Registration form attached.

NALS of Jackson

President: Marion Stone, PP, PLS

Email: MStone@mijackson.org

Stay tuned for exciting events. In the meantime, check out the NALS of Jackson County Facebook page.

NALS of West Michigan

President: Teresa M. Garber, PP, CLP

Email: tgarber@silvervanessen.com

September CLE

Thursday, September 12, 2019 at 12:00 p.m.

Special Counsel will help you promote yourselves better for promotions, special assignments, and new opportunities. Contact Lynn Philp to register: lphilp@wnj.com

NALS of Greater Kalamazoo

President: Paula Steffey, PP, CLP-SC, CWCP

Email: westernmom40@gmail.com

Court Observance Week

You are invited to join NALS of Greater Kalamazoo on Wednesday, October 9, 2019 at noon for a tour of the new Kalamazoo Defender office. Attorney Zoe Hutchins (daughter of Kathleen Hutchins, PLS) will be giving the tour and a short presentation. Box lunches will also be available to purchase. For more information, please contact Tami Carl, CLP (carlt@millerjohnson.com)

Rada Cutlery Fundraiser

NALS of Greater Kalamazoo is having a Rada Cutlery Fundraiser through September 30th. To order (and have it shipped directly to your house), go to:

<https://radafundraising.com/?rfsn=3075080.5dba18>



NALS of Lansing

President: Deb Surls, PLS

Email: deb@surls.net

4th Annual September Swing Golf Outing

Saturday, September 21, 2019, 12:00 p.m. at the Centennial Acres Golf Course in Sunfield, Michigan. To register for this fundraiser or for more information, go to:

http://www.nalsoflansing.org/uploads/1/4/1/6/14163565/2019_golf_outing_flyer.pdf

Community Service Project

Sunday, December 1, 2019, 2:00-4:00 p.m.

Advent House Soup Kitchen

Contact Judy Salminen, PLS for more information. (jsalminen@fosterswift.com)

GTALP

President: Jodi Velez, CLP

Email: jivelezii@yahoo.com

Stay tuned for exciting events. In the meantime, check out the GTALP Facebook page.

National Happenings

Mystery Suitcase Raffle

Would you like to win a carry on suitcase filled with over \$300 worth of goodies? Now you can for as little as \$5! The contents will remain a mystery until the winner is announced at NALS 68th Annual Education and Networking Conference, but you don't have to be present to win!



NALS Foundation will be raffling off the suitcase (pictured), which has been donated by Legal Staff Professionals of South Carolina. The suitcase will be chocked full of goodness from "*South Carolina: From the Mountains to the Sea. There's so much to See.*"

Tickets are \$5 each or five tickets for \$20. Tickets can be purchased in advance from any NALS Foundation Trustee or online through the links below. Tickets will be sold throughout the Little Rock conference and the deadline for pre-conference sales is September 12, 2019. The drawing will be held on September 27, 2019.

To purchase tickets, go to: <https://www.nals.org/donations/donate.asp?id=18930>



***If the winner **is not attending** the NALS 68th Annual Education and Networking Conference, the suitcase will be shipped to the winner at no cost. If the winner **is attending** the NALS 68th Annual Education and Networking Conference, you get to take the suitcase home with you with an additional \$50 in cash to cover any extra baggage fees.*

NALS Foundation Fundraising Raffle

Arkansas Crossroads Quilt

Purchase raffle tickets for a chance to win this beautiful, handmade quilt donated by Mrs. Rita Ann Gilson, PP, PLS of Philadelphia. Tickets are \$5 each or five tickets for \$20.



NALS Foundation will be announcing the raffle winner at the NALS 68th Annual Education and Networking Conference in Little Rock, Arkansas.

To purchase tickets online go to: <https://www.nals.org/donations/donate.asp?id=18938>

Tickets will also be sold the entire duration of the NALS 68th Annual Education and Networking Conference.

But the good news is you do not have to be present to win! The deadline for pre-conference online ticket purchases is September 12, 2019. And, because the NALS Foundation is a 501(c)(3) corporation, all of your donations are tax deductible.

***If the winner is not attending the NALS 68th Annual Education and Networking Conference, the quilt will be shipped to you at no extra cost. If the winner is attending the NALS 68th Annual Education and Networking Conference, you will take the quilt home with you!*

Upcoming Events

There are always a number of events happening at the national level. To see all of the events and to register, go to the Events Listing at: https://www.nals.org/events/event_list.asp

NALS Study Hall Live Series



The Study Hall Live Series begins on Tuesday, August 13, 2019 and runs through Thursday, September 19, 2019. These sessions are free to exam registrants, and only \$15.00 for Members and Non-Members who want to participate and earn CLE credit. To register for any of these sessions, go to the events page:

https://www.nals.org/events/event_list.asp?DGPCrSrt=&DGPCrPg=1



2019 Online Membership Meetings

The next Online Membership Meeting will be held on November 11, 2019 from 7:30-8:30 p.m. (CST). This is FREE to all members and you earn CLE as well! To register for this meeting, go to: <https://www.nals.org/events/EventDetails.aspx?id=1186344&group=>

Finance Committee

Benefit fundraising program

www.benefit-mobile.com



All you need to do is download the App (for I-phone or Android), select “NALS of Michigan” as the beneficiary, purchase a gift card and a portion of the proceeds goes to NALS of Michigan. You don’t need to purchase gift cards just to give as gifts – you can purchase a gift card for yourself prior to going shopping or out to dinner. You’ll be spending that same amount of money anyway so why not help our organization at the same time. A few examples are participating retailers are Applebees, Bath & Body Works, Bed Bath & Beyond, Best Buy, Burger King, K-Mart, Lowes, Old Navy, Panera, Petco, Starbucks, Target, Staples, Walmart, Home Depot, Whole Foods, Zappos and many more.

If you are not sure how to use this mobile App, go to the NALS of Michigan Facebook page and watch the video.




SALE

Logo Items

Does your chapter need gifts and/or prizes for upcoming events? Consider purchasing some NALS of Michigan logo items to give away. Prices have been reduced so these items won’t last long.

<p>List Pads 25¢ each</p>		<p>Greeting Cards \$2.00 per pack or \$5.00 for 3 packs</p> <p>(Perfect for sending to your NALS PALS)</p>	
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<p>Fidget Spinners \$2.00 each</p>		<p>Blue Tooth Speakers \$10.00 each</p>	
<p>Mugs \$10.00 each</p>		<p>To order a logo item, please contact Lynn Philp at lphilp@wnj.com.</p>	

NALS of Michigan Mix & Mingle Summer Social

By: Kathy Rood



August 17, 2019

Glen Arbor Village Wine Trail
Glen Arbor, Michigan

So when you get a group of people together like Cathy A. Zackery, CLP, Jennifer Robinson, Becky Lampen (a friend of Cathy's), Heidi S. Hopper, PP, PLS, Deborah Surls, CLP, Jen Yocum, Kathy Rood, Susan Acklin, PP, PLS, Sherri J. Bowden, PP, PLS, Ruth Schaub, PP, PLS (and her husband, John), Hillary Carroll, and Suzanne L. Christensen (and her friend, Tim), and mix that with the words "Walking Wine Tour", I hope it brings nothing but a smile to your face. I still consider myself a bit of a "newbie" (I've been a member of NALS of Lansing less than a year now ... I think it still fits), so again had no idea what to anticipate for this weekend. When I originally found out about the event I thought it would be a great way to get to know some of the girls a little better. This trip did not disappoint!



For me the trip started with a nice drive north, after a crazy work day on Friday, to a sweet little cabin in the woods with a couple of my Lansing pals. It was a nice way to start the weekend on a little smaller scale. I pulled up to a nice fire and great company. If you take away the 5,000,000 bugs swarming around us, it would have been the perfect night.

Saturday morning we all congo-lined from the cabin to a location a little further north, the Glen Arbor Village Wine Trail. First stop was the M 22 Tasting, where we joined several of our Michigan NALS pals already set up at the bar. What a cute place with many delicious wines to test and a nice shop to browse in. Even better was the atmosphere outside on their wine patio. It provided comfortable seating and an opportunity to catch up on our travels north. Just the break we needed before venturing off to stop two.

Glen Arbor Wines. We sat in the vintage-style tasting room and enjoyed a flight of yummy wines. We enjoyed catching up with Ruth Schaub and her husband, as well as getting to know our newbie, Hillary Carroll, a little better. We spent some time in the gardens at Glen Arbor Wines taking a rest, re-hydrating (me!), and swinging, enjoying the weather and a little photo op. Off to our third and final stop.

Cherry Republic. What a sweet little place. We started in the winery for taste testing with our FAVORITE wine barista, Phyllis. Phyllis didn't hesitate to join us in a toast with one of her favorites picks. She was a hoot! After wine tasting, we enjoyed shopping in the stores adjacent to the winery. There were some great salsas, jams, and bbq sauces all made with local fare. My favorite ... the white chocolate covered cherries (yes, I took a bag to go). After shopping we enjoyed a bite to eat at the Public House (our group can highly recommend the Cherry Bacon Marmalade Burger).

Our day ended with some social time at the condo that was reserved for us. The condo was very nice, with several sweet "extras" to make our stay more enjoyable and comfortable. Not enough sleeping room for all of us? Bah! We will make it work! Squeeze in girls! I really enjoyed winding down with everyone, and the beautiful sunset just over my shoulder.

Many thanks to Cathy Zackery for all of her hard work in coordinating this great social weekend. It's so very important to not only take advantage of the educational opportunities that NALS has to offer, but to also engage in social activities. You just never know what lies behind the doors that will open for you. So how about attending the 2019 NALS National Conference in Little Rock, Kathy? Here we go again!



NALS of Michigan 2019-2020 Officers

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sacklin@wnj.com

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czackery@levine-levine.com

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Rebecca Quimby, Parliamentarian
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rquimby@wnj.com





engage
inspire
enhance
promote

maximizing your potential!

NALS of Detroit Fall CLE Registration

September 18, 2019

Intellectual Property Law
Presented by Vito Ciaravino, Esquire
Warner Norcross Judd LLP

Vito Ciaravino guides clients through the patent process by preparing and prosecuting patents in the United States and abroad. Vito practices in the mechanical and electrical arts with experience in inter partes review proceedings. For Vito, achieving patent recognition for new technologies is extremely rewarding. His technical background provides a solid foundation for advising clients in the procurement, licensing, management and review of patents. Prior to joining Warner, Vito served as an intelligence officer in the United States Air Force.

5:30 PM: Meet and Greet

5:45 PM: Presentation begins

Location:	In Person Fee (including dinner):	Zoom Meeting Fee:
Warner Norcross Judd Wayne Conference Room 2000Town Center – Suite 2700 Southfield, MI 48075	\$15 – NALS of Detroit Member \$20 – Future Member	\$10 – NALS of Detroit Member \$15 – Future Member

Mail completed registration form and check payable to **NALS of Detroit** to:
Deidre McCray, Treasurer
3219 Wakefield
Berkley, MI 48072

Name: _____ Address: _____

Telephone: _____ Email: _____

Please RSVP by Friday, September 13, 2019
Need more information (i.e., Zoom log-in information)
or have questions, please contact Gayle Lawson at 734-
558-7941; email: gaelawson@gmail.com

Refund Policy:
Full refund if notification received prior to
September 13, 2019. No exceptions