

ADR on the Internet¹

I. INTRODUCTION

Numerous ADR resources are available on the Internet, and more are being added regularly.² Through this technology, ADR practitioners and others interested in ADR can obtain answers to questions, exchange views, and read ADR-related materials.³ One may also advertise for ADR business, apply for posted employment positions and register for training programs on the Internet.⁴

Internet technology is having a profound effect on the development of ADR due to its use as both an educational tool and a means for the resolution of conflict. However, due to the decentralized nature of this technology and the enormous quantity of information thereon, it would be virtually impossible to catalog all the available on-line ADR resources.⁵ The purpose of this Note is to examine the various ADR resources currently available on the Internet and their effect on the development of this area of law. Part II of this Note will discuss use of ADR-related newsgroups. Part III of this Note will investigate various World Wide Web home pages. Part IV of this Note will discuss the ramifications of the on-line age to the practice of ADR. Part V will conclude that, as we move toward the future, the Internet will be more than mere technological support for ADR; in fact, it will become an integral part of the dispute resolution process.

II. NEWSGROUPS AND DISCUSSION GROUPS

On-line newsgroups are a means for people with certain areas of interest to receive all the latest information on any given subject. The major on-line services⁶ provide access to more than 13,000 groups.⁷ Newsgroups

¹ In keeping with the spirit of this Note, all research was conducted on-line. The only books consulted were those necessary to define the nature of the Internet. For a good introduction to the nature of the Internet, see ED KROL, *THE WHOLE INTERNET: USER'S GUIDE & CATALOG* 13-15 (1994).

² William T. D'Zurilla, *Alternative Dispute Resolution: ADR Hits the Internet*, 43 LA. B.J. 187, 187 (1995).

³ *Id.*

⁴ *Id.*

⁵ *Id.* at 188.

⁶ Internet access is available through popular servers such as Prodigy, CompuServe and America Online. Specifically for lawyers is Lexis Counsel Connect, which offers several ADR discussion groups, legal memoranda and forms, and an Internet gateway. Another popular system for navigating the Internet is Netscape Navigator, which allows the user to explore the World Wide Web.

function in the following way: All those with an interest some particular subject subscribe to a designated newsgroup. Anyone who has subscribed can submit comments or "post" ideas on the particular subject to the newsgroup. All those who have subscribed receive every submission made. As a result, members of the newsgroup are "flooded" with a wealth of opinions and information on any designated subject for which a newsgroup exists.

There are various newsgroups centered around the discussion of ADR issues. As a result, the dialogue among practitioners and non-practitioners relating to these issues has increased dramatically. Through these newsgroups, more Internet users are increasing their knowledge of ADR issues, and, as a result, coming to accept ADR as a true alternative to the litigation process.

A. *Lexis Counsel Connect*

One of the best new on-line tools for practitioners of ADR is Lexis Counsel Connect ("LCC").⁸ Through this system, users can exchange e-mail, participate in discussion groups and seminars, search databases of legal memos, and read news from American Lawyer Media publications and other sources.⁹ This service also has a private menu which lets users set up permission-only groups where conferences can be held and documents exchanged around the world.¹⁰

Every day, LCC members come on-line to talk about new developments in their practice areas, as well as topical news issues that affect their professions. Within this service there are newsgroups in which practitioners from around the country debate issues in the ADR field.¹¹ The various ADR

⁷ Dana Rachlin, *Research on the Internet: Using Newsgroups for Research*, THE INTERNET LAW., Feb. 1996, at 1. Newsgroups are categorized hierarchically with the most general category to the left in the name and the most specific to the right. *Id.* For example, "rec.arts.movies" is part of the "recreation" category, which has an "arts" subdivision, which in turn includes discussions of "movies." *Id.*

⁸ See <http://www.counsel.com>.

⁹ See <http://www.counsel.com/about.htm>.

¹⁰ *Meet Your Neighbors*, AM. LAW., Dec. 1994 (LCC Supp.), at 18-19.

¹¹ At the time this Note was written, there were six separate discussion groups relating to the subject of ADR in Lexis Counsel Connect: (1) Alternative Dispute Resolution, Kenneth R. Feinberg, Kenneth R. Feinberg & Associates; (2) Alternative Dispute Resolution, William Quinby, Crosby Heafy, Roach & May, Vivien Williamson, Endispute/Bates Edwards, Jay Welsh, Judicial Arbitration & Mediation Services, Inc.; (3) Alternative Dispute Resolution, Robert C. Zampano, U.S. District Judge (Ret.); (4) Georgia ADR, Stephen E. Boswell,

newsgroups available on LCC contain discussions regarding the privatization of the justice system, comparisons between state and national ADR trends, mediator accountability,¹² book reviews, and Internet ADR service providers.¹³

B. Nova University CCRNet

Another ADR resource now available on-line is the free ADR-related newsgroup, obtainable via a subscription to Nova University's CCRNet.¹⁴ CCRNet is a private electronic network for those involved in all manner of conflict resolution on college and university campuses, and for anyone else interested in open discussion about conflict on campus.¹⁵ The purpose of this network is to discuss alternative methods of resolving conflicts by applying conflict resolution theory to practice.¹⁶

CCRNet is meant to be used as a sounding board for specific issues of campus conflict.¹⁷ One of the paramount priorities of this discussion group is to keep the identities of the actual participants in the dispute confidential by not making reference to any person's real name or actual role on campus.¹⁸ The newsgroup is also meant to be a medium for practitioners of dispute resolution to create meaningful dialogue around current issues, trends or research in dispute resolution which may have application on college and university campuses.¹⁹

Atlanta, GA; (5) Alternative Dispute Resolution, James Boskey, Seton Hall Law School; (6) Mediation/ADR, Eric Galton, Wright & Greenhill, Wendy Trachte, A.A. White Dispute Resolution Institute, Kimberlee Kovach, South Texas College, Will Pryor, Dallas, TX. See <http://www.counsel.com>.

¹² Mediation professionals from around the country have been debating the wisdom and folly of a grievance procedure for mediators in the Texas Mediation/ADR Forum on LCC. See *Pro and Con: Mediator Grievances*, TEX. LAW., Aug. 21, 1995, at 10.

¹³ *Lexis Counsel Connect: Focus On Alternative Dispute Resolution*, AM. LAW., Oct. 1995, at 2.

¹⁴ To subscribe, send an e-mail message to listproc@pulsar.acast.nova.edu and type "Subscribe CCRNet to (your name)."

¹⁵ From the introduction to CCRNet received via e-mail after subscribing to the e-mail address listed in footnote 14.

¹⁶ *Id.*

¹⁷ *Id.*

¹⁸ *Id.*

¹⁹ *Id.*

C. Miscellaneous

Postings for mediator/arbitrator referrals and other employment opportunities can be found on Usenet²⁰ and in the six Lexis Counsel Connect ADR discussion groups.²¹ Other recent discussion topics have included mediation discovery, intellectual property ADR, land use ADR and the marketing of a mediation practice.²² In general, all ADR-related newsgroups are a valuable resource to those interested in this subject.

III. THE WORLD WIDE WEB

For those exploring the Internet, perhaps the most celebrated development has been the increased use of the World Wide Web ("the Web"). In essence, the Web has done for the Internet what Windows did for the personal computer - made it easier.²³ As a result of this technological advance, a computer novice with the right software program can navigate the Internet with ease. Through the use of graphics and links to vast information resources, the Web has made the Internet a user-friendly environment.

The World Wide Web is the most recent and ambitious of the major Internet services.²⁴ The most popular way to navigate the web is through the use of the Netscape Navigator software. This software presents a multimedia interface to the Internet which can provide access to text, audio,

²⁰ See *misc.jobs.offered* and *misc.jobs.misc*. The entire concept of Usenet is based on one machine transferring postings to another. In theory, the Usenet software creates a batch of messages to go out and compresses the batch to reduce transmission time. When the next machine receives the batch, it unbatches the messages, placing the files in directories in which the news-reading software can find them. Remember that any one machine carrying Usenet messages talks to at least one other machine carrying Usenet messages, and one begins to see how this simple idea can become an immense and powerful reality. ADAM C. ENGST, *INTERNET STARTER KIT 159* (1994).

²¹ See D'Zurilla, *supra* note 2, at 187.

²² These discussion groups can be found by doing a general search in the listing of Usenet newsgroups available through most Internet service providers. Another ADR resource to which one can subscribe is ADR News from the Cornell School of Law, which provides the latest ADR information on an almost daily basis. For a free subscription, send an e-mail message to listserv@law.cornell.edu with the message, "Subscribe dispute-res (your name)."

²³ Actually, the Macintosh operating system inspired the Windows system.

²⁴ The Web tries to compile all sorts of data from a wide variety of sources, avoiding the problems of incompatibility by allowing a smart server and a smart client program to negotiate the format of the data. See ENGST, *supra* note 20, at 204.

still pictures, and even video.²⁵ Users access home pages which each have unique individual addresses and can contain links to other areas of the Web.

A. *ConflictNet*

For those equipped with Web access, a good place to begin searching for ADR materials is the ConflictNet home page.²⁶ ConflictNet is part of the Institute for Global Communications networks,²⁷ which comprise the world's only computer communications system dedicated solely to environmental preservation, peace, and human rights.²⁸ ConflictNet, which links more than 1000 users in over 90 countries is a service dedicated to promoting the constructive resolution of conflict.²⁹ Its purpose is to enhance the work of conflict resolution groups and individuals, in addition to providing links to the worldwide conflict resolution community.³⁰ ConflictNet offers current information on conflict resolution, including facilitated topical discussions on critical issues in the field, current legislation, and conference and training activity.³¹

When one logs onto the ConflictNet home page, the links to various groups within ConflictNet are displayed. These links have titles including Membership and Professional Organizations, Universities Offering Conflict

²⁵ KROL, *supra* note 1, at 295.

²⁶ This home page can be found at <http://www.ige.apc.org/conflictnet/>. For more information, e-mail this organization at conflictnet@conflictnet.org.

²⁷ The Institute for Global Communications Networks represent the United States branch of the Association for Progressive Communications (APC) Networks, a group of 11 cooperative international networks. The bulletin-board style networks offer discussions on peace, the environment, human rights, and social justice issues. For more information, contact the organization at: Institute for Global Communications, San Francisco, California, (415) 442-0220, or e-mail the organization at: support@ige.apc.org.

²⁸ Other networks within the ICG include PeaceNet, EcoNet, WomensNet, and LaborNet.

²⁹ Dristiana Helmick, *For a Spat or War, Who Ya Gonna Call? Feudbusters*, CHR. SCI. MNTR., June 7, 1995, at 1.

³⁰ See ConflictNet home page, *supra* note 26.

³¹ *Id.*

Resolution Degrees, Service Providers,³² and Training and Certification Programs.³³

Because it provides links to so many other resources, ConflictNet is a good place to begin a search of ADR materials available on the Internet. The ConflictNet homepage is a good directory of ADR service providers that provide information on-line; simply clicking on the chosen link provides immediate access to the desired information.

B. *The American Arbitration Association*

The ConflictNet Web Pages also provide access to the American Arbitration Association ("AAA") home page.³⁴ From the AAA home page, one can gain access to various educational resources, case administration resources, listings of regional offices and membership information. The advantage of such a home page is the manner in which it facilitates education about ADR while providing access a means of settling disputes. For example, the AAA home page has a link to a page entitled *A Beginners' Guide to Alternative Dispute Resolution*.³⁵ On this page, those unfamiliar with the concept of ADR have an invaluable educational tool. The page explains the various forms of and their advantages over traditional litigation. Another link from the AAA home page³⁶ demonstrates how arbitration clauses within contracts should be drafted so as to have disputes submitted to the AAA.

Other links from the AAA home page allow downloading of all the rules, guides and forms necessary to submit a dispute to the AAA.³⁷ In addition, all rules of the Association are available on-line through links to other Web pages.³⁸ The AAA also offers case administration via private on-line computer chat rooms on Lexis Counsel Connect.

³² Listed service providers include Access: A Security Information Service, The American Arbitration Association, Conflict Resolution Unlimited, Community Boards, Community Relations Service, Concur, Florida Conflict Resolution Consortium, First Mediation Corporation, Kern Mediation Group, The Mediation Center, The Rosenthal Group, and Conflict Resolution Service Providers.

³³ *Id.*

³⁴ See <http://www.adr.org>.

³⁵ See <http://www.adr.org/guide.html>.

³⁶ See AAA home page, *supra* note 34.

³⁷ *Id.*

³⁸ The rules available on-line include the Commercial Arbitration Rules, Commercial Mediation Rules, Construction Industry Arbitration Rules, Construction Industry Mediation Rules, Employment Dispute Resolution Rules, International Arbitration Rules, The United

In addition to providing better access to the rules by which the AAA decides cases, the AAA home page also provides links to recent articles on the development of ADR.³⁹ Through these pages, the latest developments in mediation, arbitration, or mini-trials become available through the Web.

C. TACR

Another on-line resource available on the Web is the Technical Arbitration & Conflict Resolution ("TACR") home page.⁴⁰ TACR is an organization which offers services in dispute avoidance and dispute resolution. TACR offers these services through expert advice, assistance in contract negotiations, mediation and conciliation, arbitration, and adjudication during contract performance.⁴¹

This home page contains links to various articles on ADR-related topics. In addition, the page provides direct Web links to ConflictNet, GAMA⁴² and the International Court of Arbitration.⁴³

D. The Better Business Bureau

The Better Business Bureau (BBB) established a home page on the World Wide Web in April, 1995.⁴⁴ After only three weeks of operation, the BBB Web server had provided ethical marketplace information on-line to thousands of consumers.⁴⁵ This home page provides links to information regarding the BBB's ADR services.⁴⁶

One such service is BBB Auto Line, which was developed to help automobile manufacturers and individual customers resolve disputes concerning alleged manufacturing defects.⁴⁷ Acting as an impartial third

States Arbitration Act, and The Uniform Arbitration Act. See <http://www.adr.org/standard.html> or <http://www.adr.org/usaa.html#top>.

³⁹ See <http://www.adr.org/whatsnew.html>; see also <http://www.adr.org/articles.html>.

⁴⁰ <http://www.batnet.com/oikoumene/tacr.html#services>.

⁴¹ *Id.*

⁴² See *infra*. Part III.F.

⁴³ The home page of the International Court of Arbitration is located at <http://www1.usa1.com/~ibnet/iccab.html>.

⁴⁴ *Better Business Bureau Now Accepts Complaints On-Line*, PR Newswire, Oct. 23, 1995, available in LEXIS, Nexis Library, PRNEWS file.

⁴⁵ *Id.*

⁴⁶ The address of this home page is <http://www.cbbb.org/cbbb/>. To obtain information on retaining the Council of Better Business Bureaus dispute resolution services, call Steve Salter, Director of ADR Development, at 1-800-537-4600.

⁴⁷ <http://www.bbb.org/bbb/adr/autoline.html>.

party, the BBB utilizes conciliation and mediation techniques and, if needed, arbitration⁴⁸ to help resolve problems.⁴⁹ This informal, out-of-court settlement mechanism is free to customers.⁵⁰

Another service provided by the BBB is BBB Care, which is a customer assistance program designed to help businesses and their customers resolve problems through mediation techniques and arbitration.⁵¹ Under this program, the local Better Business Bureau staff will work with a business and its customer to put the customer in contact with the company's designated customer service specialist. The BBB staff will also work to keep lines of communication open between disputing parties, relay offers, write up settlements, verify performance of settlement agreements, and coordinate and conduct an arbitration hearing that provides a binding resolution to the dispute.⁵²

In addition to these specialized services, the BBB home page also contains links to information regarding the training of mediators and arbitrators⁵³ and informational papers regarding the best solutions for particular ADR problems.⁵⁴

⁴⁸ BBB Auto Line arbitrators are volunteers from the various communities where this system exists. They are trained and certified by the Council of Better Business Bureaus. The BBB home page, *supra* note 46, contains links to information on how to become a volunteer arbitrator.

⁴⁹ BBB Auto Line, *supra* note 47.

⁵⁰ BBB Auto Line does not handle disputes between consumers and automobile dealerships, automotive repair facilities, or automobile insurance companies. For more information call the BBB Auto Line program at 1-800-955-5100. *Id.*

⁵¹ <http://www.bbb.org/bbb/adr/bbbcare.htm>. Some 900 businesses, from landscapers to decorating companies, have signed up for the BBB Care program. If arbitration is chosen, the consumer has the option to accept or reject the decision. If the consumer accepts the decision, the manufacturer is legally bound to abide by the decision. However, by accepting the decision, the consumer gives up the right to sue the manufacturer in court on any claim that was resolved at the arbitration hearing, unless the manufacturer fails to perform according to the arbitrator's decision, or unless otherwise provided by state or federal law. If the consumer rejects the decision, the manufacturer is not obliged to perform any part of the decision. While access to information regarding this service is available on-line, the actual dispute resolution process has not yet reached the on-line stage. *Id.*

⁵² *Id.*

⁵³ See <http://www.bbb.org/bbb/adr/adrserv.html>.

⁵⁴ Links to these papers are available on the BBB home page at <http://www.bbb.org/bbb/adr.html>. These papers cover topics including Ombudsmen, Mini-Trials and Summary Jury Trials, Regulatory Negotiation, Mediation, Single-Issue vs Multi-Issue Mediation, Peer Mediation, Mediator Qualifications and Standards, Arbitration, and Understanding Automobile Leasing.

In October of 1995, the BBB introduced an on-line complaint form, which allows consumers to file complaints against businesses and charities on-line through the BBB home page.⁵⁵ The information provided on-line by the consumer is then automatically forwarded to the appropriate BBB staff member, who will help the consumer and the company reach a satisfactory settlement.⁵⁶

E. SPIDR

Another of the major ADR resources available on the Internet is the home page of the Society of Professionals in Dispute Resolution ("SPIDR").⁵⁷ This organization is composed of respected leaders and practitioners of ADR who saw a need for the creation of a professional association of neutrals (mediators, arbitrators, etc.) that would educate the public about various dispute resolution procedures.⁵⁸ In essence, SPIDR is a professional "home" for ADR practitioners; it is a place where they can network, discuss the latest innovations in the field, share findings from current research, and converse about the roles and responsibilities of neutrals in the dispute resolution process.⁵⁹

Professionals on the SPIDR network discuss topics such as understanding international activities, exploring cross cultural issues, contributing to the complex public arena.⁶⁰ Through its Web pages, SPIDR also encourages people to join the organization. Members of SPIDR receive discounts on various ADR publications,⁶¹ a membership directory,⁶² proceedings and reports,⁶³ and the SPIDR Job Line.⁶⁴

⁵⁵ *Better Business Bureau Now Accepts Complaints On-Line*, *supra* note 44.

⁵⁶ *Id.*

⁵⁷ See <http://www.igc.apc.org/spidr/>. Questions relating to SPIDR can be sent via e-mail to spidr@conflictnet.org.

⁵⁸ *Id.*

⁵⁹ *Id.*

⁶⁰ *Id.*

⁶¹ Individuals joining SPIDR will receive discounts on *The Negotiation Journal*, *The Ohio State University Journal on Dispute Resolution*, *The World Arbitration and Mediation Report*, and *The Arbitration Journal*.

⁶² This directory provides members with the addresses of current members in order to facilitate networking and to make it easy to find colleagues in a particular geographical area or area of practice.

⁶³ Every SPIDR member receives a copy of *Proceedings: A Synopsis of the Annual International Conference*, as well as special reports and scholarly articles of interest to the SPIDR membership. SPIDR's committee reports are circulated to all members. Report topics

F. GAMA

While numerous ADR providers use the Internet to advertise their services, there is one company which is actually providing ADR services directly through the Internet.⁶⁵ A company called Global Arbitration & Mediation Association, Inc. ("GAMA") presently offers to conduct arbitration and mediation on-line via Internet relay, chat and e-mail services.⁶⁶ Keeping in mind the growth of national and international commerce over the Internet, GAMA's arbitration and mediation procedures are designed to permit resolution of disputes with more ease than if these were submitted to traditional litigation.⁶⁷ This is because with GAMA, the judge and jury come to the user via the Internet.⁶⁸

In order to initiate an on-line arbitration under GAMA, users click onto GAMA's form bank and download the Demand For Arbitration Form.⁶⁹ This form must then be served upon the opposing party. The opposing party must respond to the demand for arbitration or mediation by filing a Response to Demand, which may or may not include a claim for compensable injuries.⁷⁰ Filing of these documents to GAMA is defined as submission by e-mail or fax to GAMA.⁷¹ A filing is presumed to have occurred at the time any document is transferred via e-mail.⁷² Following the filing of documents, the parties send a confirmation copy to GAMA and the opposing parties via first-class mail.⁷³

The GAMA home page also contains links to information regarding frequently asked questions on the subject of ADR.⁷⁴ These links are an

have included ethical standards of practice, criteria for qualifications, and law- and public policy-mandated dispute resolution procedures.

⁶⁴ Members can take advantage of this listing of job announcements in the field of ADR at no charge. Non-members are charged a fee per job response.

⁶⁵ D'Zurilla, *supra* note 2, at 188.

⁶⁶ See <http://www.gama.com/>. For additional information e-mail tkread@mindspring.com.

⁶⁷ See <http://www.gama.com/>.

⁶⁸ *Id.*

⁶⁹ See <http://www.gama.com/forms.htm>.

⁷⁰ *Id.*

⁷¹ *Id.* Service is defined as the sending of a document to another party at his or her e-mail address.

⁷² *Id.*

⁷³ *Id.*

⁷⁴ See SPIDR home page, *supra* note 57.

excellent resource for those attempting to learn about using of ADR in resolving disputes. The subject matter of these questions consists of basic information such as the definitions of arbitration and mediation, as well as a broader range of topics covering how neutrals are selected, whether awards are legally enforceable, how to arbitrate without a commercial arbitration clause, and what types of disputes can be arbitrated.⁷⁵

GAMA's form bank contains all the necessary documentation for submitting a dispute to arbitration or mediation.⁷⁶ In addition, GAMA also has a database of corporate, commercial, real estate, and other general legal forms.⁷⁷ Furthermore, the GAMA Web pages contain a directory of alternative dispute organizations and professionals,⁷⁸ which is indexed alphabetically, geographically, organizationally, and by subject matter.⁷⁹

G. National Private Court

Another netuser who is interested in ADR is attempting to create a National Private Court ("NPC") where private court judges would try cases using federal procedural rules.⁸⁰ This court would employ a private three-judge appellate panel empowered to review the initial decision.⁸¹

The idea of the NPC was conceived over 18 years ago, but failed due to lack of funding.⁸² However, through the Internet, certain individuals are attempting to gather support for such an endeavor by soliciting the help of those interested in becoming private court judges for compensation and those interested in submitting their disputes to the NPC.⁸³

H. The Virtual Magistrate

The National Center for Automated Information Research is funding a newly established "Virtual Magistrate Project," which will assist in the rapid resolution of computer network disputes. Through this service, a pool

⁷⁵ *Id.*

⁷⁶ <http://www.gama.com/forms.htm>.

⁷⁷ *Id.*

⁷⁸ <http://www.gama.com/director.htm>.

⁷⁹ To place a listing in this directory, mail the information to T.K. Read, President, GAMA Inc., or e-mail the information to theresa@wwa.com.

⁸⁰ D'Zurilla *supra* note 2, at 188.

⁸¹ For information on this service, see http://www.lawmall.com/files/lm_npc1.html.

⁸² *Id.*

⁸³ For more information on the NPC write to National Private Court Division of Paralegal Institute, Inc. c/o Carl E. Person, 325 W. 45th Street - Suite 201, New York, N.Y., 10036-3803, (212) 307-4444.

of neutral arbitrators with experience in the law and in the use of computer networks will serve as the Virtual Magistrates. These magistrates will be selected jointly by the American Arbitration Association and the CyberspaceLaw Institute.

Complaints will be accepted through either e-mail⁸⁴ or through a form on the Virtual Magistrate's World Wide Web site.⁸⁵ After complaints are received, an impartial magistrate will be assigned to the case. Proceedings will normally take place through e-mail. The goal is to reach a decision within 72 hours whenever possible. Information on cases decided will be publicly available at the Virtual Magistrate Web site.

IV. THE INTERNET'S EFFECT ON ADR

In light of the technological advances previously discussed, certain questions must be investigated. Will Internet access to ADR information truly educate the user on ADR's potential as an alternative to litigation? Will the availability of these on-line resources cause greater movement away from traditional litigation? Will more ADR providers offer direct, real-time mediations and arbitrations on-line so that the parties need not even leave their offices? While no one knows the answers to these questions, change is inevitable.

The most profound effect of the Internet on ADR is that through this technology, an effective means of resolving conflict has now been brought into each user's home or office. While, originally, ADR took the resolution of disputes outside of the courtroom, the Internet has brought ADR directly to each individual's personal computer. Just as television brought the world into our living rooms, the Internet has given us the ability to go out and interact with that world from our living rooms. ADR will only benefit and grow from this interaction.

Martin C. Karamon

⁸⁴ vmag@mail.law.vill.edu.

⁸⁵ <http://vmag.law.vill.edu:8080/>.