

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA
3 WESTERN DIVISION - LOS ANGELES

4 UNITED STATES OF AMERICA,) Case No. CV 16-8697-MWF (SSx)
5 Plaintiff,)
6 v.) Los Angeles, California
7 UNITED HEALTH GROUP, INC.,) Thursday, March 14, 2019
8 et al.,) 11:02 A.M. to 11:28 A.M.
9 Defendants.)
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15 TRANSCRIPT OF PROCEEDINGS
16 BEFORE THE HONORABLE SUZANNE H. SEGAL,
17 UNITED STATES MAGISTRATE JUDGE.

18 Appearances: See Page 2
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1 LOS ANGELES, CALIFORNIA, THURSDAY, MARCH 14, 2019, 11:02 A.M.

2 THE CLERK: Good morning, counsel. This is John,
3 clerk to Judge Segal. All necessary parties on the line?

4 PAUL G. FREEBORNE: I believe -- this is
5 Paul Freeborne. I'm not sure. did John Lee identify
6 himself? I'm not sure John's on the phone yet.

7 JOHN E. LEE: Yes, I'm on the line.

8 MR. FREEBORNE: Okay. I'm sorry, John.

9 MR. LEE: Is Dan Segal on the line?

10 DAN SEGAL: Yeah. Hi. It's Dan Segal from RTI.
11 I'm here. Thanks.

12 DAVID J. SCHINDLER: And this is David Schindler on
13 behalf of United, and everybody on behalf of United is here
14 as well.

15 THE CLERK: Thank you. I'm going to call the case.

16 CV 16-8697-MWF (SSx), *United States of America v.*
17 *United Health Group, Inc., et al.*

18 Counsel, please state your appearances starting
19 with the plaintiff.

20 MR. FREEBORNE: Paul Freeborne and Amy Likoff on
21 behalf of the Government.

22 THE COURT: Good morning.

23 JOHN E. LEE: Good morning --

24 HENRY C. SU: Henry -- go ahead. Sorry.

25 MR. LEE: John Lee on behalf of the United States.

1 THE COURT: Good morning.

2 HENRY C. SU: Good morning, Your Honor. This is
3 Henry Su on behalf of the relator.

4 THE COURT: Good morning.

5 DAVID J. SCHINDLER: -- all your expecting today
6 from the Government and from relator?

7 MR. FREEBORNE: I believe so.

8 MR. SCHINDLER: Okay.

9 Good morning, Your Honor. It's David Schindler on
10 behalf of United Health, and also on the line are Dan Meron,
11 Kirstin Do, and Abid Qureshi.

12 THE COURT: Good morning.

13 So we're here for an informal discovery conference.
14 I believe Mr. Schindler and the defendants have asked for
15 this conference so I'll let you speak first. I did look at
16 the email discussion between the parties that was submitted
17 to my clerk so I know a little bit about the issue, but why
18 don't, Mr. Schindler, you discuss the issue, and then I'll
19 hear from the Government.

20 MR. SCHINDLER: Thank you, Your Honor. I think
21 just for clarity, Mr. Segal is on the call on behalf of the
22 third-party RTI. (Indecipherable) the part of the discussion
23 we're going to have today as well so I just wanted to alert
24 the Court to that and --

25 THE COURT: All right.

1 MR. SCHINDLER: -- and in some senses that the
2 concerns we have are -- begin with the third-party subpoena
3 that we issued to RTI.

4 THE COURT: Okay.

5 MR. SCHINDLER: So the issue here, really,
6 Your Honor, is, from our perspective, the Government's
7 ongoing efforts to thwart discovery and to stall at every
8 turn. And what's happened, as you know, of course, in
9 conjunction with our prior hearing, there's been an ongoing
10 effort on the part of the Government to suggest that the
11 documents that we seek to defend ourselves are not relevant,
12 and that, of course, surfaced in multiple hearings before
13 Your Honor. It surfaced in the context of the motions that
14 (indecipherable) in the context of the deliberative-process
15 privilege, and it's now surfaced yet again in the context of
16 our efforts to obtain documents from third parties, most
17 notably, in this instance, a nonprofit and Government
18 contractor called "RTI."

19 And we issued a subpoena to RTI on February 1st of
20 this year, and the documents that we were seeking from RTI,
21 in broad terms, were documents that, as the Government has
22 indicated, go to (indecipherable - background noise) for
23 service adjustor, and, in essence, as we understand it, RTI
24 was one of the contractors and architects and researchers who
25 helped build the HCC risk model that the Government has

1 employed and is at the heart of the dispute here. And so we
2 issued a subpoena to RTI seeking various documents that go
3 directly to the defenses in this case that we had outlined
4 for you previously as part of that deliberative-process
5 privilege motion, and these are various things like the -- we
6 had the audit methodology --

7 (Participant leaves the call.)

8 MR. SCHINDLER: -- the fee for service adjustor,
9 and basically they're the various documents that go to the
10 heart of what we talked about with you previously.

11 We received responses and objections from RTI on
12 February 14th, and in that, they told us that it had come to
13 their attention, presumably from conversations with the
14 Government, that the Government had interposed relevancy
15 objections to our efforts to obtain these documents and,
16 therefore, RTI took the position that they would not produce
17 documents to us unless and until the various motions pending
18 before Judge Fitzgerald had been resolved. That includes the
19 appeal of the order that Your Honor issued in conjunction
20 with the motion we litigated on the deliberative-process
21 privilege, as well as the Government's other motions that are
22 still outstanding as referenced in the email and the Court --
23 Your Honor knows that the Government is continuing to seek a
24 revised scheduling order.

25 We attempted to meet and confer on this issue on a

1 couple occasions, and we had a -- the most recent meet-and-
2 confer on March 5th, and, candidly, you know, we were hoping
3 to resolve this, and we even were willing to agree that we
4 would all just wait until Judge Fitzgerald had ruled on the
5 appeal of the deliberative-process motion as well as the
6 other motion, but we had a very simple request. We said,
7 "All right. Look, let's agree, then, to do what we did with"
8 -- "in conjunction with the deliberative-process privilege
9 appeal, which is if you lose" -- this is what we said to the
10 Government and to RTI -- "we want a commitment from you that
11 you will thereafter produce documents to us within a defined
12 period of time," and we asked them to make that commitment so
13 that we had some certainty and we would not, essentially,
14 have to start from scratch again on April 9th, assuming
15 Judge Fitzgerald issued an order on April 8th.

16 We asked them to come back to us for a proposal.
17 The Government responded and simply said, "No. We just want
18 to wait and see." And in the email that Mr. Lee sent to the
19 Court, he failed to indicate that, in essence, they're
20 unwilling to commit to any kind of a timeframe and
21 essentially want us to have to wait until April 9th to begin
22 anew in the context of getting some documents produced or
23 having any sort of timeframe. And even with respect to RTI,
24 we understood they had concerns about (indecipherable) want
25 -- wanting to raise some issues about whether we could

1 prioritize any of those things, and we offered to do that,
2 and they've said they're unwilling to do that with us as
3 well.

4 So at some sense -- in some sense, this meet-and-
5 confer -- or this informal conference was designed to get at
6 two things, Your Honor. One, you have said to the Government
7 on many occasions that, notwithstanding their filing of
8 motions, we are entitled to seek discovery, and they continue
9 to (indecipherable) Your Honor's observations to them.
10 You've already ruled previously that the relevance
11 objections, as interposed, are not appropriate and, even if
12 they were, they were overcome by our need for the documents.

13 And, really, the secondary issue is this notion of
14 our having to continually wait because the Government has
15 unilaterally stalled and is thwarting our efforts to get the
16 documents that we need to defend ourselves, and it's coming
17 out of this hearing that the only thing we have is a
18 commitment from RTI and the Government that if the judge
19 rules against the Government on these -- this relevance
20 objection that we will have documents produced within a
21 defined period of time. That, to us, is all we're looking
22 for. It's what we asked for, and it's what they've been
23 unwilling to give us.

24 THE COURT: All right. Thank you.

25 Mr. Lee or someone for the Government?

1 MR. FREEBORNE: This is Paul Freeborne, Your Honor.

2 THE COURT: Okay.

3 MR. FREEBORNE: First of all, we are mindful of
4 your previous rulings to keep this case moving forward, and
5 so we acknowledge those rulings. This circumstance, though,
6 is distinguishable from those previous rulings. We're now
7 less than three weeks away from receiving rulings from
8 Judge Fitzgerald on the relevance issues that Mr. Schindler
9 has identified and that are directly implicated by the RTI
10 requests. And I also note that some of these concerns also
11 relate to some of the requests that have been propounded to
12 us in the litigation. But suffice it to say that we will get
13 rulings.

14 What we are not prepared to do, though, at this
15 juncture is to forego arguments, forego objections without
16 having seen Judge Fitzgerald's ultimate ruling on these
17 things. We have been consulting with our client. We will do
18 so promptly upon the receipt of Judge Fitzgerald's order, be
19 it from the bench on April 8th or subsequently, but we --
20 again, Mr. Schindler is asking us to commit to forego
21 arguments, burden and otherwise, that we're just not prepared
22 to do so until we know what the scope of the case is.

23 And if -- and consistent with the Court's previous
24 rulings, if it's the Court's preference to engage in
25 briefing, we think that that's duplicative and repetitive,

1 but we're prepared to do that, and just so we're clear, it
2 would also include a motion for a protective order as to the
3 -- not -- in addition to a motion to quash, it would be a
4 motion for a protective order with respect to requests that
5 have been propounded against the Government.

6 So I -- we think practicalities tilt in our favor,
7 and now we're less than three weeks away from the hearing,
8 but we're also mindful of your Court's -- the Court's
9 previous rulings in terms of moving the case forward. So, if
10 we need to engage in briefing, we will do so.

11 THE COURT: Mr. Schindler, did you want to respond?

12 MR. SCHINDLER: I do, Your Honor. I mean, this is
13 the same argument that we've heard from the Government every
14 other time, which is "Hearing dates are upon us. Please,
15 Judge, don't rule. Let's all just wait and see."

16 I think, also, at some level counsel for RTI, who I
17 know is on the call -- you know, to the extent that we have
18 valid -- validly issued subpoenas outstanding to RTI, we just
19 don't believe that it's an appropriate way to approach this
20 to effectively say to us that RTI at this point can ride the
21 coattails of procedurally what amounts to an improper third-
22 party objection by the Government at this point, that the
23 Government really doesn't have standing to object to a
24 subpoena that we've issued to a third party. We think the
25 documents are relevant, Your Honor has said that they're

1 relevant, and we're entitled to the documents. It's almost
2 that simple.

3 THE COURT: All right. I heard there was an
4 attorney for Mr. -- for RTI. Do you wish to be heard or --

5 MR. SEGAL: Sure, Your Honor, just very briefly.
6 It's Dan Segal, in-house counsel at RTI.

7 My only point here is that RTI is -- has no dog in
8 this fight. We're not a party to the litigation. And -- you
9 know, and we understand that there are questions about
10 whether or not the information that United wants from RTI --
11 our only take on it is, given the immense burden on us to
12 have to comply with this, why not wait and see if -- you
13 know, how the rulings go on the relevancy? They're only a
14 few weeks away.

15 And we have -- you know, we've not done nothing.
16 We're going through and trying to figure out exactly, you
17 know, what kind of stuff we might have that would be relevant
18 for this. The -- their document requests are incredibly
19 broad. They basically ask for almost 20 years of data for a
20 number of projects. We've gone back and looked, and it is
21 likely that we are somewhere upwards of 90 different
22 custodians who've worked on these projects. Not to mention
23 the, you know, tens and tens and tens and tens of thousands
24 of emails over that time period.

25 We've got spare drives that have over 300 gigs

1 worth of data, which we haven't even been able to get access
2 to because we need government approval for it, and, again,
3 it's through CMS, which we're working on all that. We also
4 have large data sets that are all requested by the doc
5 requests that, you know, in addition to all sorts of problems
6 -- like, they include PHI and PII of these Medicare
7 recipients. In addition to that, you know, we're talking
8 about literally terabytes worth of data.

9 So this is not an easy give here, and our only take
10 on it is, given that burden and given, at least, some
11 possibility, as far as we understand, that the judge -- the
12 court is going to rule at some point that this stuff isn't
13 even relevant to the case, and since we are a nonparty
14 nonprofit, why -- you know, our take on it is that it makes
15 sense, if possible, for us to sort of wait a few weeks and
16 see how it plays out before we spend all that time and
17 energy, time and energy that would necessarily, given the
18 people involved, be taken away from the CMS work that we're
19 doing, which would then put the -- you know, the CMS -- would
20 put CMS in a tough place as well because they rely on us for
21 all of these reimbursements and data sets for their Medicare
22 work.

23 THE COURT: All right.

24 Mr. Schindler, I have a question for you.

25 MR. SCHINDLER: Yes, Your Honor.

1 THE COURT: So in the email that Mr. Lee submitted
2 to the courtroom deputy, he quotes the December 26, 2018,
3 order of Judge Fitzgerald, which essentially stayed the
4 production of documents by the United States, and then it
5 says (reading) In the event that the motion for review is
6 denied in whole or in part, the United States shall comply
7 with the discovery order as it may be modified by the court
8 within three days of the denial of the motion for review.

9 How do you interpret that order from
10 Judge Fitzgerald?

11 MR. SCHINDLER: Well, Your Honor, that order came
12 as a result of our willingness to stipulate. So it was not
13 an order from Judge Fitzgerald staying. We agreed because
14 the Government raised the issue with us much in the same way
15 they're raising the issue here today. We said to them,
16 "Look," you know, "we're going to press ahead." They said,
17 "Well, look, let's wait until" -- because we had to set a
18 briefing schedule, and they wanted more time for the briefing
19 on the appeal from the order, and so we said, "All right.
20 Look, we're willing to do that, but we want a date certain,
21 we want," you know, "an understanding that, if you lose, that
22 we get our documents." And we -- in that context, the
23 parties stipulated to that stay with the understanding that
24 if they were ruled -- that they lost their appeal, we would
25 get our documents within three days.

1 So that order was nothing more than a stipulation
2 that the parties entered into, and, frankly, it's the exact
3 same stipulation we offered to the Government and to RTI in
4 this context. We said the same thing. We said, "Look, we
5 don't want to have unnecessary briefing. We just don't want
6 to have to start from scratch when" -- "if and when the court
7 rules in our favor. So let's agree and" -- I said to them,
8 "Tell us what's a reasonable timeframe."

9 We even said, "Look, we understand three days may
10 be too quick," because in the deliberative-process privilege
11 context, documents have been pulled, they've been logged,
12 they're there, they're waiting to be produced' so hence the
13 three days that the parties stipulated to. We asked the
14 Government and RTI that exact same question. We said, "Look,
15 let's do the same thing. Tell us" -- "give us," you know, "a
16 reasonable amount of time in which you're willing to
17 produce," and they said they'd go back and consider that.

18 They then came back to us and said, "No. We're
19 unwilling to do something similar to what happens in a
20 deliberative-process privilege appeal. We will not commit to
21 any timeframe," and as Mr. Freeborne said to you a moment
22 ago, essentially what they want to do is wait and see what
23 happens with Judge Fitzgerald and then essentially start anew
24 then, and at that point, from our perspective, it means we've
25 got to -- we're going to have to be down this road

1 regardless, and hence we're starting now because we don't
2 really have any choice.

3 And to be clear, it's an ineffective strategy to
4 stall on their part. This subpoena was issued to RTI on
5 February 1st, and when parties are saying, "Well, let's just
6 wait a matter of weeks," it's essentially going to be a two-
7 month delay, and this has been a problem that we've run into
8 chapter and verse. Frankly, we're running into it with other
9 third parties. There's another third party out there called
10 "ARDX." They've agreed to produce documents but the --
11 they've told us that the Government has essentially been
12 unwilling to review documents for privilege so they're
13 holding up that production as well.

14 And so in that context, what we have here is the
15 Government unilaterally controlling the flow of documents,
16 not just from themselves but now through third parties, and
17 there is no stay, as Mr. Lee says. It's something that arose
18 from the stipulation that the parties entered into.

19 THE COURT: Mr. Freeborne, did you want to respond
20 to that?

21 MR. FREEBORNE: No. Just, I guess, the last part.
22 We haven't instructed any third -- we're not holding back on
23 a reviewing for privilege. Again, we -- that process needs
24 to be guided by whatever is in the case, and that's why we
25 believe it's prudent, with respect to everything, to await

1 those rulings that will hopefully come forth in less than
2 three weeks' time. But we haven't held back documents, as
3 Mr. Schindler's suggesting.

4 We've, instead, just -- with respect to the stay,
5 yes, we will produce those documents, if we lose, pursuant to
6 the stay order, but that pertains to a discrete universe.
7 This -- as this conference demonstrates, there are other
8 documents -- for example, from RTI -- and we're not willing
9 to forego arguments and objections with respect to those
10 types of documents in advance of the ruling.

11 THE COURT: Are you going to be raising the
12 deliberative-process privilege as to the RTI documents?

13 MR. FREEBORNE: Perhaps, Your Honor. We need to
14 consult with the client. Much of that will be -- or some of
15 that discussion will revolve around the scope and whether or
16 not the agency can now assert privilege -- whatever the scope
17 is that comports with Your Honor's ruling with respect to the
18 process -- asserting deliberative process.

19 THE COURT: So --

20 MR. FREEBORNE: So that's the calculation --

21 THE COURT: Yeah. I mean, I guess the way I see
22 this issue is I think that the stipulation that the parties
23 -- that they entered into that Judge Fitzgerald signed off on
24 sounds like a pretty reasonable approach, that you agree to
25 forego anything in the intervening time until he rules on the

1 review of my order. That makes sense to me. So I guess it
2 would make sense to me for United to enter into a similar
3 stipulation with the third parties, that is -- you know,
4 because I think, you know, the Government and the third
5 parties would have to endure a great deal of burden and work
6 to either brief those issues or to start producing, and we
7 should wait until Judge Fitzgerald rules on the privilege
8 issue.

9 But I also think that the third parties should take
10 advantage of the offer to work with Mr. Schindler and come up
11 with a reasonable date for production after the court's
12 ruling, if the ruling is to uphold the earlier decision that
13 the privilege did not apply or the privilege was overcome, so
14 that United doesn't have to wait too long for the production
15 of those documents. I wouldn't expect it to be three days
16 because the Government has had much more notice about
17 United's interest in its documents, and so I would assume
18 that the Government has, you know, taken steps to segregate
19 and review and do all that work. I know they have taken
20 steps to do that, things that, probably, the third parties
21 are just starting to do when they receive the subpoenas.

22 So I guess what I'd like to see is a stipulation
23 like the one that was filed before with more time for the
24 third parties, and I think you could include in the
25 stipulation that the third parties are not waiving their

1 right to object on other grounds to the production. I mean,
2 to the extent -- I heard, I believe, you know, the Government
3 say they don't want -- or RTI -- nobody wants to waive any
4 objections. I think you could put that in the stipulation
5 and then give more time -- I mean, you know, 30 days, 45 days
6 -- and you could bring those objections, whether its burden
7 or privilege or some other objection, to my attention in that
8 intervening time, and I would try to work within the
9 framework the parties set up.

10 But I have a hard time understanding why the third
11 parties don't want to enter into some kind of an agreement
12 with the defendants because that seems like sort of an
13 orderly way to proceed. But that's their choice. If they
14 choose not to enter into some kind of agreement setting up a
15 schedule for production after the resolution of the, you
16 know, privilege issue, then the default is the rules, and
17 then Mr. Schindler would have a right to move to compel
18 production on the subpoenas, and the third parties would have
19 to move for protective orders on various grounds, and they
20 may lose those, and I might not give them as much time as
21 they could negotiate with Mr. Schindler.

22 So it seems, to me, wise for the third parties to
23 sit down with United and say, "We recognize," you know,
24 "there's a lot of burden in this process, that we're going to
25 delay until there's a ruling from the court, but after the

1 court rules and if it rules that production is required, then
2 we will work within this framework" -- 30 days, 45 days --
3 something like that. That seems to me to be a -- you know,
4 addresses everybody's interests in the process.

5 I guess, Mr. Segal, you know, maybe I'm missing
6 something, but is there a reason why your client can't do
7 that?

8 MR. SEGAL: No, there's no reason why we can't.
9 I'm not sure that 30 or 45, you know, is going to be
10 realistic given the huge quantity, but the general framework
11 makes sense to me.

12 THE COURT: All right. Well, I think you and
13 Mr. Schindler can talk about that, and I would -- if it came
14 to me, I would certainly take into consideration declarations
15 from RTI about burden and -- but, you know, we're in a case
16 with a lot of dollars at stake, and, you know, there might be
17 some cost-shifting options, there might be vendors involved
18 that could accelerate the process so, you know, I'd expect a
19 declaration to kind of address all of those issues. But I
20 just think you and Mr. Schindler should sit down and come up
21 with a plan for after Judge Fitzgerald rules because, if he
22 does uphold this Court's order, then I would expect there to
23 be an orderly production of documents by RTI.

24 MR. SCHINDLER: Your Honor, it's David Schindler.
25 Appreciate very much what you said, and just to

1 give the Court some comfort, we offered exactly that, and
2 indeed has offered with RTI, to prioritize and help work with
3 them on the burden issue, and that offer remains open, and we
4 look forward to meeting and conferring with Mr. Segal further
5 to try and prioritize those requests. There are certainly
6 some low-hanging fruit that are easy to produce, things like
7 contracts between the Government and RTI that will reflect
8 (indecipherable - background noise). We're happy to work
9 with them and, as you correctly noted, work on reasonable
10 timeframes. It's exactly what we had suggested in our prior
11 meet-and-confer. We recognize and never asked them to
12 produce on three days for exactly the reasons the Court has
13 said. So very much appreciate your guidance.

14 THE COURT: All right. Any other questions or
15 concerns?

16 MR. FREEBORNE: Not from the Government,
17 Your Honor. Thank you. Thank you for your time.

18 THE COURT: Thank you very much.

19 MR. SCHINDLER: Thank you, Your Honor.

20 UNIDENTIFIED SPEAKER: Thank you, Your Honor.

21 UNIDENTIFIED SPEAKER: Thank you.

22 (Proceedings adjourned at 11:28 a.m.)

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CERTIFICATE

I certify that the foregoing is a correct transcript
from the electronic sound recording of the proceedings in the
above-entitled matter.

/s/ Julie Messa
Julie Messa, CET**D-403
Transcriber

March 22, 2019
Date