

Appendix A

Glossary of Terms

Auto precharge: Auto precharge is an optional setting in DRAM read commands that eliminates the data stored in the DRAM in order to prepare for the next operation. It is a technology included on both SDRAM and DDR SDRAM.

BIOS: Basic Input / Output System. BIOS is built-in software that allows a computer to control the keyboard, display screen, disk drives, serial communications, and a number of miscellaneous functions without accessing programs from a disk.

Bus: The term bus refers to lines connecting devices in a computer, through which electrical signals are sent. A memory bus would be all of the lines that connect each memory device to the memory controller on the computer's motherboard.

Chipset / controller : The memory controller is generally part of the chipset. The memory controller is the device typically located on a motherboard of a computer, which controls communications between the CPU and the memory. The chipset also controls communications between the CPU and the other systems in the computer.

DDR SDRAM Standard: Double Data Rate SDRAM Standard. The DDR SDRAM Standard built upon many of the technologies already incorporated in the previous SDRAM Standard, and added new technologies to increase the speed and efficiency of the memory system. DDR SDRAM was developed during the mid to late 1990s at JEDEC and was adopted as a JEDEC standard in 1998. DDR SDRAM devices began ramping up in production in 1999 and in 2002 it overtook SDRAM as the predominant memory device.

DDR II SDRAM Standard: The DDR II Standard built upon many of the technologies incorporated in the previous SDRAM and DDR SDRAM Standards, and added more technologies to increase the speed and efficiency of the memory system. DDR II SDRAM was developed in the Future DRAM Task Group starting in April of 1998. DDR II devices began ramping up in production in late 2003 and are predicted to begin to replace DDR as the DRAM predominantly used in personal computers in 2004.

DRAM: Dynamic Random Access Memory. DRAM is a form of computer memory that is used in computers and other products. This form of memory is used to temporarily store digitally recorded information such that it is as available to be accessed when needed by the CPU. DRAM is "dynamic" because it needs to be refreshed every fraction of a second, otherwise the information is lost.

Dual bank design / multibank design: Dual bank design allows one bank of memory cells on a DRAM chip to be accessed while the other bank is preparing to be accessed. It is a technology included on both SDRAM and DDR SDRAM. RDRAM uses an advanced form of multibank

design with many more banks than JEDEC-compliant SDRAM or DDR SDRAM.

Dual edge clocking: Dual edge clocking means capturing data off both the rising and falling edges of the clock. This allows for twice the amount of data to be sent in each clock cycle compared to single edge clocking, where data is only sent on one edge of the clock. Dual edge clocking is a technology included on DDR SDRAM and on RDRAM.

EIA: The Electronic Industries Alliance (“EIA”) is a national trade association that represents all areas of the electronics industry. EIA is affiliated with JEDEC as well as with other associations.

Externally supplied reference voltage: Externally supplied reference voltage is the baseline voltage which is used to determine if a voltage signal is positive (one) or neutral (zero). If the voltage is higher than the reference voltage then the signal would be considered a one. If lower, it would be considered a zero. The advantage to externally supplied reference voltage is that it may provide a more accurate reference point for the signals transmitted. It is a technology included on RDRAM, SDRAM, and DDR SDRAM.

IEEE: The Institute of Electrical and Electronics Engineers (“IEEE”) is an organization that seeks to advance the theory and application of electrotechnology and allied sciences, serves as a catalyst for technological innovation and supports the needs of its members through a wide variety of programs and services since 1963. IEEE working groups sometimes work in conjunction with JEDEC subcommittees in developing certain standards.

JEDEC: The JEDEC Solid State Technology Association (once known as the Joint Electron Device Engineering Council), is the semiconductor engineering standardization body of the Electronic Industries Alliance (EIA). JEDEC has existed since 1960 and is the primary standard- setting organization at issue in the Rambus matter.

JC-42 Committee: The JC-42 Committee is a JEDEC committee, which focuses on Memory Devices. Jim Townsend was the chairman of this committee for the operative period.

JC-42.3 Subcommittee: The JC-42.3 Subcommittee is a JEDEC subcommittee of the JC-42 Committee, which focuses on RAM Memories. Gordon Kelley was the chairman of this subcommittee for the operative period.

Memory module: Memory module refers to the component which includes the DRAM chips and the small printed circuit board upon which the chips are placed. Memory modules are plugged directly into computers and memory upgrades to personal computers are performed by adding new memory modules to the computer.

MOST / Mosys: Mosys was a company that developed the MOST DRAM in the mid 1990s. The MOST DRAM was proposed proprietary memory solution, but it never achieved significant market penetration.

Motherboard: The motherboard is the printed circuit board upon which almost all important

components of a computer are fastened. Memory modules, CPUs, and video cards, among other components, are plugged in to the motherboards in personal computers.

Multiplexed bus: A multiplexed bus is a bus, whose lines are used for more than one function, during an operation. For example, each multiplexed bus line might carry address, command, and data information between the memory and the controller during a read or write operation.

Narrow / wide bus: A narrow bus refers to a bus that contains few lines relative to a wide bus. A traditional wide bus contains dedicated bus lines used to transmit only certain types of information. For example, there typically are dedicated lines for address, command, and data information. By contrast, a narrow bus may use shared or multiplexed bus lines to transmit different types of information (for example both address information and control information) on the same lines.

Packetized / packet-based operation: A packetized bus carries packets of information. A packet of information is a set of related signals carried on a bus over multiple clock lines that has a distinguishable beginning and ending point. Within that packet can be multiple different types of information regarding a transaction like a read or write request. For example, a packet could include address, command, and data information. This technology characterized each of the various forms of RDRAM and was proposed for some forms of SyncLink and RamLink DRAM. This technology is not used in either SDRAM or DDR SDRAM.

Phase lock loops / Delay lock loops: Phase lock loops (“PLLs”) and delay lock loops (“DLLs”) are circuits used to adjust the timing of the clock on each DRAM in a computer to bring that clock into closer alignment with a system clock. It is a technology included on DDR SDRAM and on RDRAM, although each used the circuits in different ways. Neither the original version of SyncLink nor SDRAM made use of either PLLs or DLLs to align the clock on the DRAM with the system clock.

Processor / CPU: Central processing unit. The processor / CPU is the central brain of the computer. The processor / CPU makes decisions based on the information that it receives from memory devices, including the DRAM chips. Examples of current processor / CPUs are Intel’s Pentium 4 or Intel’s Pentium M.

Programmable burst length: Programmable burst length refers to a method of determining the number of cycles of data to be transmitted to the memory controller in response to a single command. It is a technology included on both SDRAM and DDR SDRAM. RDRAM uses a similar technology it refers to as programmable block size.

Programmable CAS latency: Programmable CAS latency refers to a method of controlling data output timing by determining the number of clock cycles to pass after the memory controller sends the column access strobe, or CAS, before valid data appears on the bus lines. It is a technology included on both SDRAM and DDR SDRAM. RDRAM uses a similar technology it refers to as programmable access time.

Quad CAS: Quad CAS is a technology that was incorporated in JEDEC DRAM standards in

the early 1990s. This technology allowed the DRAM industry to use standard DRAMs with four data lines in combination with the error detection technology (parity checking) used at the time. Without quad CAS or a comparable technology, only specialized DRAMs with single data lines could take advantage of that error detection technology.

RamLink: RamLink was a specification for a packet-based memory that was developed at an IEEE working group in the 1990s. RamLink was developed with a triply multiplexed, packetized bus. Although it was standardized, it never achieved significant market penetration. RamLink was a forerunner of SyncLink.

RDRAM: Rambus Dynamic Random Access Memory. RDRAM is a proprietary type of DRAM that was designed by Rambus founders Horowitz and Farmwald in 1989 through the early 1990s. The initial RDRAM design, as described in Rambus's patents, was characterized by its narrow bus—only 14 lines in its preferred implementation—and triply multiplexed, triply packetized bus architecture. The basic notion of RDRAM was to use a narrow, high-speed bus to carry data in packets between memory chips. The narrow bus connecting the memory chips to the memory controller would carry all address, data, and control information to each of the memory chips in the system, where device identifier information in each packet would be used to identify which DRAM in the system would use each packet.

There have been a number of different versions of RDRAM, starting with the original version described in the April 1990 patent application, followed by Basic, Concurrent, and Direct RDRAM in sequence. Direct RDRAM is the version developed for, and currently being used in, personal computers. The main differences between the different versions of RDRAM is that the original version used a very small number of lines in the bus to carry substantially all of the information transmitted between the chipset and the DRAMs, and did not use dedicated lines, while later versions of RDRAM increased the number of lines in the memory bus overall and started to use lines dedicated for specific types of data (e.g., address lines). Even with the additional lines, the RDRAM memory bus has substantially fewer lines than JEDEC standard-compliant systems. For this reason, RDRAM memory is often referred to as having a narrow-bus architecture.

SDRAM: Synchronous Dynamic Random Access Memory. SDRAM is a type of DRAM that was designed by members of JEDEC in the early 1990s. SDRAM is synchronous, i.e., each DRAM's internal clock, which governs its behavior, is linked to a system clock, allowing for more rapid sequencing of communications between the CPU and memory. The typical SDRAM uses a number of dedicated lines to carry control, address, and data signals between the memory controller and each memory chip. As a result the number of bus lines is large relative to the number of lines in an RDRAM system, often ranging from 100 to 200 parallel bus lines. For this reason, SDRAM memory is often referred to as having a wide-bus architecture.

SDRAM Lite: SDRAM Lite was a proposal for a simpler, cheaper version of the SDRAM Standard that was discussed at JEDEC during the mid 1990s. It did not include all of the features of SDRAM. In some proposals for SDRAM Lite, both burst length and CAS latency were to be fixed and not programmable.

SDRAM Standard: The SDRAM Standard was developed during the early 1990s at JEDEC

and was adopted as a JEDEC standard in October 1993. Memory devices conforming to the SDRAM Standard began ramping up in production in the mid-1990s and by 1998, SDRAMs accounted for approximately 60% of DRAM revenue share.

SyncLink: SyncLink was a specification for another form of packet-based memory that was first proposed at the IEEE during the mid 1990s and later developed in the privately formed SyncLink Consortium. Later proposals were doubly multiplexed and packetized; they had shared command and address lines and separate, dedicated data lines. SyncLink never achieved significant market penetration.

System clock: A system clock in a computer consists of a series of electrical impulses that resemble sine waves. A system clock is used to ensure that the behavior of each component in the system (e.g., DRAMs and memory controllers) maintain their operations in an appropriate timing to all of the other components in the system.

Source Synchronous clocking: Source synchronous clocking is a technology where a clock signal travels with the data and is used to capture the data off of the bus. Because both the data signals and the clock signals come from the same source, the clock and data have a fixed, known (synchronous) relationship to each other, thereby allowing for increased data rates. It is a technology included on DDR SDRAM, but not on SDRAM.

Appendix B

Witness Index¹

Steven Appleton: Chairman of the Board of Directors, Chief Executive Officer and President of Micron Technology, Inc. Mr. Appleton has been at Micron since 1991.

Andreas Bechtolsheim: Vice President and General Manager of Gigabit Systems at Cisco Systems, Inc. He co-founded Sun Microsystems, a company that builds UNIX servers and workstations and was Vice President of Technology. He also founded Granite Systems, a developer of gigabit switching products.

Henry Becker: Vice President and Managing Director of Infineon Technologies Richmond. Mr. Becker is in charge of the operations of Infineon's DRAM manufacturing plant in Richmond.

Reese Brown: Retired engineer who attended JEDEC meetings as a consultant to JEDEC in the 1990's.

Sam Calvin: Former Senior Staff Electrical Engineer at Intel Corporation. Mr. Calvin was a representative for Intel at JEDEC meetings from 1992-1997.

Samuel Chen: Mitsubishi's JEDEC representative throughout the 1990's.

Richard Crisp: Engineer who was Technology and Business Development Manager of the Asia-Pacific Region at Rambus. Mr. Crisp was the primary Rambus representative at JEDEC JC 42.3 meetings from May 1992 until Rambus withdrew from JEDEC.

William Davidow: Chairman of the Board of Directors at Rambus.

Anthony Diepenbrock: Patent attorney who joined Rambus as an in-house lawyer in September 1995 and remained until May 1999. He is now Of Counsel at Dechert LLP.

Mike Farmwald: Co-founder of Rambus and member of its Board of Directors.

Martin Fliesler: Founding partner of the intellectual property law firm of Fliesler, Dubb, Meyer & Lovejoy LLP in San Francisco, California.

Michael Geilhufe: Consultant and retired Intel executive.

¹ The information in this Witness Summary Index is substantially similar to the information found in the Joint Witness Index, which was filed pursuant to 16 C.F.R. § 3.46 on September 5, 2003.

Bob Goodman: Chief Executive Officer of Kentron Technologies, Inc, a company that provides memory solutions.

Jackie Gross: Director of Memory Central Direct Procurement at Hewlett-Packard Company. Ms. Gross was formerly the head of memory procurement, including DRAM, at Compaq. She supervised Compaq's JEDEC representative and is currently the supervisor of Hewlett-Packard's JEDEC representative.

Alan Grossmeier: Engineer at Cray, Inc, who has served as Cray's JEDEC representative since 1989.

David Gustavson: Secretary of the SyncLink Consortium in the mid-1990's who attended and took minutes of numerous SyncLink meetings.

Craig Hampel: Technical Director at Rambus.

Gary Harmon: Former Chief Financial Officer at Rambus.

Richard Heye: Vice President and General Manager of Platform Engineering & Infrastructure at Advanced Micro Devices, Inc, a company that makes and sells microprocessors and flash memory.

Mark Horowitz: Co-founder of Rambus and member of its Board of Directors.

Bruce L. Jacob: Associate Professor of Department of Electrical & Computer Engineering at the University of Maryland.

Joel Karp: Former Vice-President of Intellectual Property at Rambus in the late 1990's. Mr. Karp was a JEDEC representative for Samsung in the early to mid 1990's.

Gordon Kelley: Senior Engineer at IBM Corporation. Mr. Kelley was chairman of JEDEC subcommittee JC-42.3, served as Chair of the JEDEC Council, and represented IBM at JEDEC from 1984-1998.

John Kelly: Executive Vice President and General Counsel of the Electronic Industries Alliance and President of the JEDEC Solid State Technology Association. He has been the EIA General Counsel since September of 1990 and the JEDEC President since 2000.

Mark Kellogg: Distinguished Engineer at IBM Corporation with responsibilities associated with definition of the memory used in IBM's servers. Mr. Kellogg has been a participant and/or representative in JEDEC meetings since 1989.

Ilan Krashinsky: Memory Technology Expert at Hewlett-Packard Company. Mr. Krashinsky has represented Hewlett-Packard in JEDEC meetings.

Thomas Landgraf: Commodity Manager for Semiconductor Memories at Cisco Systems, Inc.

Mr. Landgraf formerly was a DRAM Senior Procurement Engineer at Hewlett-Packard Company. Mr. Landgraf attended JC-42.3 subcommittee meetings on behalf of Hewlett-Packard from 1994-1999 and served on the JEDEC Council from 1998-1999.

Terry Lee: Executive Director of Advanced Technology and Strategic Marketing at Micron Technology, Inc. He was also a JEDEC participant for Micron from 1994-2002.

Joe Macri: Director of Technology at ATI Technologies, Inc, a company that provides graphics design to the computer industry. Mr. Macri has been a representative to JEDEC since 1997, presided as the former Chairman of the Future DRAM Task Group, and is the current chairman of JEDEC subcommittee JC-42.3.

Pete MacWilliams: Senior Fellow at Intel Corporation, and is also Director of Platform Architecture.

Jeffrey Mailloux: Executive at Micron Technology, Inc.

Preston McAfee: Murray Johnson Professor of Economics at the University of Texas, Austin.

Jim McGrath: Director of Strategic Product Development at Molex Connector Corporation. He has been a JEDEC representative on behalf of Molex since 1992.

Willi Meyer: Manager of Technical Marketing for Memory Products at Infineon AG. He was a JEDEC representative for Siemens, then later for Infineon since 1985 and acted as the primary representative for many years.

David Mooring: President Rambus and member of its Board of Directors.

Mark E. Nusbaum: Examiner in Chief at the Patent and Trademark Office and is currently a patent attorney with Nixon and Vanderhye, P.C. law firm, resident in the firm's Arlington, Virginia office.

K. H. Oh: Professor at the Korea Advanced Institute of Science and Technology. He was formerly a Senior Vice President at Hyundai, now Hynix, overseeing Hyundai's semiconductor operation.

Martin Peisl: Senior Director for Specialty DRAM Marketing for Infineon Technologies North America Corp.

Steven Polzin: Senior AMD Fellow and Chief Platform Architect at Advanced Micro Devices, Inc.

Betty Prince: DRAM industry consultant with her own firm, Memory Strategies International. While at Texas Instruments in the early 1990's, she served as a JEDEC representative.

Richard Rapp: President of National Economics Research Associates ("NERA"), which is an

economics consulting firm that specializes in the economics of competition. Prior to joining NERA, Dr. Rapp was a professor at the State University of New York at Stony Brook.

Werner Reczek: Vice President and Managing Director at Infineon Technologies Austria AG in Villach, Austria.

Desi Rhoden: President and Chief Executive Officer of Advanced Memory International, Inc. Mr. Rhoden formerly worked at Hewlett-Packard, and VLSI, a chipset manufacturer, and represented both companies at JEDEC. Mr. Rhoden has been a JEDEC member since the late 1980s. He was the Chairman of the JEDEC Council in 1998 and is the current Chairman of the Board of JEDEC. He also serves as Chairman of the JC-42 committee.

Brian Shirley: Design Operations Manager for the Computing and Consumer Group at Micron Technology, Inc.

Donald Soderman: Consultant and retired executive in the semiconductor industry.

Howard Sussman: Senior Manager of Marketing & Development at Sanyo Semiconductor Corporation. Mr. Sussman has served as a participant of Mostek, NEC and Sanyo in JEDEC meetings since 1979. Mr. Sussman is a member of the Board of Directors of JEDEC.

Farhad Tabrizi: Vice President of Worldwide Marketing of Memory Products at Hynix Semiconductor Inc. Mr. Tabrizi was a representative of Hynix (and its predecessors) in JEDEC meetings. Mr. Tabrizi was chairman of the SyncLink Consortium.

Geoffrey Tate: Chief Executive Officer of Rambus and member of its Board of Directors.

David Teece: Chairman of LECG, an economic consulting firm, who is also a Professor at the Haas School of Business at the University of California, Berkeley.

Lester Vincent: Partner at Blakely, Sokoloff, Taylor & Zafman, resident in the firm's Sunnyvale, California office. He served as Rambus's outside patent counsel for much of the 1990s.

Barry Wagner: Manager of Technical Marketing at nVIDIA Corporation, a designer and manufacturer of graphics processors and chipsets. Mr. Wager has been a representative of nVIDIA in JEDEC meetings.

Fred Ware: Principal Engineer at Rambus.

Hans Wiggers: JEDEC representative on behalf of Hewlett-Packard during much of the 1990's. He was also a member of the JEDEC Council.

Brett Williams: Strategic Marketing Manager for Desktop Systems at Micron Technology, Inc. Mr. Williams was a representative of Micron in JEDEC meetings from 1991-1993.

Appendix C

Cross-Reference of Findings Of Fact

<u>ALJ Finding</u>	<u>Based on</u>	<u>Corresponding Reply Finding (if applicable)</u>
1	CCFF 10	RRFF 10
2	CCFF 11	RRFF 11
3	CCFF 12	RRFF 12
4	CCFF 14; RRFF 14	
5	CCFF 17	RRFF 17
6	CCFF 27	RRFF 27
7	CCFF 35	RRFF 35
8	CCFF 36	RRFF 36
9	CCFF 37-38	RRFF 37-38
10	CCFF 39; RRFF 39	
11	CCFF 40-41	RRFF 40-41
12	CCFF 42	RRFF 42
13	CCFF 44*	RRFF 44
14	RFF 795	CCRF 795
15	RFF 796	CCRF 796
16	CCFF 46	RRFF 46
17	CCFF 48	RRFF 48
18	CCFF 49	RRFF 49
19	CCFF 50	RRFF 50
20	CCFF 51	RRFF 51
21	CCFF 52	RRFF 52
22	CCFF 53	RRFF 53
23	CCFF 54	RRFF 54
24	CCFF 56	RRFF 56
25	CCFF 57	RRFF 57
26	RFF 1278*, RFF 1291*	CCRF 1278, CCRF 1291
27	RFF 27	CCRF 27
28	RFF 28	CCRF 28
29	RFF 29	CCRF 29
30	RFF 30*	CCRF 30
31	RFF 31	CCRF 31

Key

CCFF: Complaint Counsel Proposed Findings of Fact

CCRF: Complaint Counsel Reply Findings of Fact

RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

~: does not clearly correspond to proposed finding from either party

*: contains portion or is similar to proposed finding

ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
32	RFF 32	CCRF 32
33	RFF 33*	CCRF 33
34	RFF 33*	CCRF 33
35	RFF 34	CCRF 34
36	RFF 35	CCRF 35
37	RFF 36	CCRF 36
38	RFF 37	CCRF 37
39	RFF 38	CCRF 38
40	RFF 39	CCRF 39
41	RFF 41	CCRF 41
42	RFF 42	CCRF 42
43	RFF 43	CCRF 43
44	RFF 44	CCRF 44
45	RFF 45	CCRF 45
46	RFF 59	CCRF 59
47	RFF 60	CCRF 60
48	RFF 61	CCRF 61
49	RFF 62	CCRF 62
50	RFF 63	CCRF 63
51	RFF 64	CCRF 64
52	RFF 65	CCRF 65
53	RFF 66	CCRF 66
54	RFF 67	CCRF 67
55	RFF 68	CCRF 68
56	RFF 69	CCRF 69
57	RFF 70	CCRF 70
58	CCFF 700*	RRFF 700
59	CCFF 701	RRFF 701
60	RFF 1194*	CCRF 1194
61	~	
62	RRFF 703	
63	CCFF 704; RRFF 704	
64	CCFF 705; RRFF 705	
65	RRFF 706*	
66	RRFF 706*	
67	RRFF 706*	

Key

CCFF: Complaint Counsel Proposed Findings of Fact

CCRF: Complaint Counsel Reply Findings of Fact

RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
68	CCFF 707; RRF 707	
69	CCFF 710	RRFF 710
70	CCFF 711	RRFF 711
71	CCFF 713	RRFF 713
72	RFF 50*	CCRF 50
73	RFF 50*	CCRF 50
74	CCRF 50	
75	RFF 51*	CCRF 51
76	RFF 51*	CCRF 51
77	RFF 51*	CCRF 51
78	CCRF 51	
79	RFF 52	CCRF 52
80	RFF 53	CCRF 53
81	RFF 56*	CCRF 56
82	RFF 57	CCRF 57
83	CCFF 714	RRFF 714
84	CCFF 715	RRFF 715
85	CCFF 716	RRFF 716
86	RRFF 717	
87	CCFF 720	RRFF 720
88	CCFF 721	RRFF 721
89	CCFF 722	RRFF 722
90	CCFF 723	RRFF 723
91	CCFF 724	RRFF 724
92	CCFF 732*	RRFF 732
93	RRFF 732*	
94	CCFF 733	RRFF 733
95	RRFF 733	
96	CCFF 735*	RRFF 735
97	CCFF 739	RRFF 739
98	CCFF 740; RRF 740 *	
99	CCFF 741; RRF 741*	
100	CCFF 744	RRFF 744
101	RRFF 744	
102	RFF 606	CCRF 606
103	RFF 607	CCRF 607

Key

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
104	RFF 608	CCRF 608
105	RFF 609	CCRF 609
106	RFF 610	CCRF 610
107	RFF 611	CCRF 611
108	RFF 612	CCRF 612
109	RFF 613*	CCRF 613
110	RFF 614	CCRF 614
111	RFF 616*	CCRF 616
112	RFF 616*	CCRF 616
113	RFF 617	CCRF 617
114	RFF 618	CCRF 618
115	RFF 619*	CCRF 619
116	RFF 620	CCRF 620
117	RFF 621	CCRF 621
118	RFF 622*	CCRF 622
119	RFF 623*	CCRF 623
120	RFF 624*	CCRF 624
121	RFF 625*	CCRF 625
122	RFF 626	CCRF 626
123	RFF 627	CCRF 627
124	RFF 628	CCRF 628
125	RFF 629*	CCRF 629
126	RFF 629*	CCRF 629
127	RFF 630	CCRF 630
128	RFF 631	CCRF 631
129	RFF 632	CCRF 632
130	RFF 633	CCRF 633
131	RFF 634	CCRF 634
132	RFF 635	CCRF 635
133	RFF 636	CCRF 636
134	RFF 637	CCRF 637
135	RFF 597	CCRF 597
136	RFF 598	CCRF 598
137	RFF 599	CCRF 599
138	RFF 600	CCRF 600
139	RFF 601	CCRF 601
140	RFF 602	CCRF 602
141	RFF 603	CCRF 603

Key

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
142	RFF 604	CCRF 604
143	RFF 605	CCRF 605
144	RFF 648	CCRF 648
145	RFF 649-50	CCRF 649-50
146	RFF 651	CCRF 651
147	RFF 653	CCRF 653
148	RFF 654	CCRF 654
149	RFF 638	CCRF 638
150	RFF 639	CCRF 639
151	RFF 640	CCRF 640
152	RFF 641	CCRF 641
153	RFF 642	CCRF 642
154	RFF 643	CCRF 643
155	RFF 644	CCRF 644
156	RFF 645	CCRF 645
157	RFF 646	CCRF 646
158	RFF 647	CCRF 647
159	CCFF 746; RRFF 746	
160	CCFF 747	RRFF 747
161	CCFF 747; RRFF 747	
162	CCFF 1246*	RRFF 1248
163	CCFF 1249*	RRFF 1249
164	CCFF 1250; RRFF 1250	
165	CCFF 1252*	RRFF 1252
166	CCFF 756; RRFF 756	
167	CCFF 763; RRFF 763	
168	CCFF 725	RRFF 725
169	CCFF 729*	RRFF 729
170	CCFF 729*	RRFF 729
171	CCFF 729*	RRFF 729
172	CCFF 730*	RRFF 730
173	CCFF 730*	RRFF 730
174	CCFF 730*	RRFF 730
175	CCFF 730*	RRFF 730

Key

CCFF: Complaint Counsel Proposed Findings of Fact

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
176	CCFF 731	RRFF 731
177	RFF 657	CCRF 657
178	RFF 658	CCRF 658
179	RFF 714	CCRF 714
180	RFF 715	CCRF 715
181	RFF 716	CCRF 716
182	RFF 717*	CCRF 717
183	RFF 659	CCRF 659
184	RFF 660	CCRF 660
185	RFF 661	CCRF 661
186	RFF 662	CCRF 662
187	RFF 663	CCRF 663
188	RFF 665	CCRF 665
189	RFF 667	CCRF 667
190	RFF 664	CCRF 664
191	RFF 668	CCRF 668
192	RFF 669	CCRF 669
193	RFF 671	CCRF 671
194	RFF 672	CCRF 672
195	RFF 673	CCRF 673
196	RFF 674	CCRF 674
197	RFF 676	CCRF 676
198	RFF 677	CCRF 677
199	RFF 678	CCRF 678
200	RFF 679	CCRF 679
201	RFF 681	CCRF 681
202	RFF 682	CCRF 682
203	RFF 683	CCRF 683
204	RFF 685*	CCRF 685
205	RFF 687	CCRF 687
206	RFF 688	CCRF 688
207	RFF 689	CCRF 689
208	RFF 690	CCRF 690
209	RFF 691*	CCRF 691
210	RFF 692	CCRF 692
211	RFF 693	CCRF 693
212	RFF 694	CCRF 694
213	RFF 696	CCRF 696

Key

CCFF: Complaint Counsel Proposed Findings of Fact

CCRF: Complaint Counsel Reply Findings of Fact

RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

~: does not clearly correspond to proposed finding from either party

*: contains portion or is similar to proposed finding

ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
214	RFF 697*	CCRF 697
215	RFF 698	CCRF 698
216	RFF 699	CCRF 699
217	RFF 700	CCRF 700
218	RFF 701*	CCRF 701
219	RFF 703	CCRF 703
220	CCFF 201	RRFF 201
221	CCFF 200	RRFF 200
222	CCFF 202*; RRFF 202	
223	CCFF 202*	RRFF 202
224	CCFF 203	RRFF 203
225	CCFF 204	RRFF 204
226	CCFF 206; RRFF 206	
227	CCFF 209*	RRFF 209
228	RRFF 209*	
229	RRFF 209*	
230	CCFF 210	RRFF 210
231	RRFF 211	
232	CCFF 213	RRFF 213
233	CCFF 214*	RRFF 214
234	RRFF 214*	
235	CCFF 215; RRFF 215	
236	RRFF 216	
237	CCFF 219; RRFF 219	
238	RRFF 219	
239	CCFF 221*	RRFF 221
240	CCFF 221*	RRFF 221
241	CCFF 222	RRFF 222
242	CCFF 224	RRFF 224
243	CCFF 227	RRFF 227
244	CCFF 225-26	RRFF 225-26
245	RRFF 226	
246	CCFF 228	RRFF 228
247	CCFF 230*	RRFF 230
248	CCFF 230*	RRFF 230

Key

CCFF: Complaint Counsel Proposed Findings of Fact

CCRF: Complaint Counsel Reply Findings of Fact

RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
249	CCFF 231	RRFF 231
250	CCFF 232	RRFF 232
251	CCFF 233	RRFF 233
252	CCFF 234; RRFF 234	
253	CCFF 235	RRFF 235
254	CCFF 236	RRFF 236
255	CCFF 237; RRFF 237	
256	CCFF 238; RRFF 238	
257	CCFF 239	RRFF 239
258	CCFF 243	RRFF 243
259	CCFF 506	RRFF 506
260	CCFF 241	RRFF 241
261	CCFF 245	RRFF 245
262	CCFF 247	RRFF 247
263	CCFF 248	RRFF 248
264	CCFF 249	RRFF 249
265	CCFF 252	RRFF 252
266	CCFF 254*	RRFF 254
267	CCFF 254*	RRFF 254
268	CCFF 255	RRFF 255
269	CCFF 257	RRFF 257
270	CCFF 258	RRFF 258
271	CCFF 260	RRFF 260
272	CCFF 867	RRFF 867
273	CCFF 982*; CCFF 1039*	RRFF 982; RRFF 1039
274	RRFF 867	
275	CCFF 871*, 880*, 902*, etc.	RRFF 871, 880, 902, etc.
276	RRFF 902	
277	CCFF 968; RRFF 968	
278	RRFF 1626*	
279	CCFF 1626*	RRFF 1626
280	CCFF 1626*	RRFF 1626
281	RRFF 1626*	

Key

CCFF: Complaint Counsel Proposed Findings of Fact

CCRF: Complaint Counsel Reply Findings of Fact

RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
282	CCFF 1627	RRFF 1627
283	CCFF 1629	RRFF 1629
284	RFF 338	CCRF 338
285	~	
286	CCFF 503	RRFF 503
287	RRFF 503	
288	CCFF 504	RRFF 504
289	CCFF 2229	RRFF 2229
290	RRFF 2229*	
291	RRFF 2229*	
292	CCFF 508	RRFF 508
293	RRFF 509	
294	CCFF 510; RRFF 510	
295	CCFF 511	RRFF 511
296	CCFF 512	RRFF 512
297	CCFF 513	RRFF 513
298	RRFF 514*	
299	RRFF 514*	
300	CCFF 515	RRFF 515
301	CCFF 516*	RRFF 516
302	CCFF 516*	RRFF 516
303	RRFF 514*	
304	RRFF 514*	
305	RRFF 514*	
306	CCFF 516	RRFF 516
307	CCFF 518	RRFF 518
308	CCFF 519	RRFF 519
309	CCFF 519; RRFF 519	
310	CCFF 520	RRFF 520
311	CCFF 521	RRFF 521
312	CCFF 522; RRFF 522*	
313	CCFF 523; RRFF 523	
314	RRFF 524*	
315	RRFF 524*	
316	CCFF 527*	RRFF 527

Key

CCFF: Complaint Counsel Proposed Findings of Fact

CCRF: Complaint Counsel Reply Findings of Fact

RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
317	CCFF 527*	RRFF 527
318	CCFF 527; RRFF 527	
319	CCFF 528; RRFF 528	
320	CCFF 529-30	RRFF 529-30
321	CCFF 531	RRFF 531
322	CCFF 532*	RRFF 532
323	CCFF 532*	RRFF 532
324	CCFF 535	RRFF 535
325	CCFF 536	RRFF 536
326	CCFF 537	RRFF 537
327	CCFF 538	RRFF 538
328	CCFF 539	RRFF 539
329	CCFF 540	RRFF 540
330	CCFF 925	RRFF 925
331	CCFF 542	RRFF 542
332	CCFF 543	RRFF 543
333	CCFF 544	RRFF 544
334	CCFF 545	RRFF 545
335	CCFF 546	RRFF 546
336	CCFF 547	RRFF 547
337	CCFF 548	RRFF 548
338	RRFF 545	
339	CCFF 549	RRFF 549
340	CCFF 550*	RRFF 550
341	CCFF 550*	RRFF 550
342	CCFF 551	RRFF 551
343	RRFF 549	
344	CCFF 552	RRFF 552
345	CCFF 553	RRFF 553
346	RRFF 552	
347	CCFF 554	RRFF 554
348	RRFF 554	
349	CCFF 555	RRFF 555
350	RRFF 555	
351	CCFF 558	RRFF 558
352	CCFF 559	RRFF 559

Key

CCFF: Complaint Counsel Proposed Findings of Fact

CCRF: Complaint Counsel Reply Findings of Fact

RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
353	CCFF 560	RRFF 560
354	CCFF 561	RRFF 561
355	CCFF 562	RRFF 562
356	CCFF 977	RRFF 977
357	CCFF 563	RRFF 563
358	RRFF 718	
359	CCFF 566	RRFF 566
360	CCFF 567	RRFF 567
361	CCFF 568	RRFF 568
362	RRFF 569	
363	CCFF 570	RRFF 570
364	CCFF 571	RRFF 571
365	CCFF 572; RRFF 572	
366	CCFF 573	RRFF 573
367	CCFF 574; RRFF 574	
368	CCFF 575	RRFF 575
369	CCFF 576	RRFF 576
370	CCFF 577	RRFF 577
371	RRFF 580*	
372	RFF 410	CCRF 410
373	RFF 403	CCRF 403
374	RFF 405	CCRF 405
375	RFF 404	CCRF 404
376	RFF 407; RFF 411	CCRF 407; CCRF 411
377	RFF 411	CCRF 411
378	RFF 412	CCRF 412
379	RFF 413	CCRF 413
380	RFF 399	CCRF 399
381	RFF 400	CCRF 400
382	RFF 401	CCRF 401
383	RRFF 579*	
384	RRFF 579*	
385	RRFF 579*	
386	RRFF 579*	
387	CCFF 588	RRFF 588
388	CCFF 589	RRFF 589

Key

CCFF: Complaint Counsel Proposed Findings of Fact

CCRF: Complaint Counsel Reply Findings of Fact

RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

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*: contains portion or is similar to proposed finding

ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
389	CCFF 590	RRFF 590
390	CCFF 591; RRFF 591	
391	CCFF 592	RRFF 592
392	CCFF 593	RRFF 593
393	RRFF 2369	
394	RRFF 2370	
395	~	
396	RRFF 2379	
397	CCFF 604	RRFF 604
398	CCFF 2370; RRFF 2370	
399	CCFF 610	RRFF 610
400	CCFF 611	RRFF 611
401	CCFF 612	RRFF 612
402	CCFF 613	RRFF 613
403	CCFF 614; RRFF 614	
404	CCFF 615	RRFF 615
405	CCFF 617	RRFF 617
406	CCFF 618; RRFF 618	
407	CCFF 619	RRFF 619
408	RRFF 620	
409	RRFF 621	
410	CCFF 622; RRFF 622	
411	CCFF 623; RRFF 623; RRFF 578	
412	CCFF 628	RRFF 628
413	RRFF 628	
414	CCFF 629; RRFF 629	
415	CCFF 633	RRFF 633
416	CCFF 637	RRFF 637
417	CCFF 638	RRFF 638
418	CCFF 639; RRFF 639	
419	CCFF 2332	RRFF 2332
420	CCFF 642	RRFF 642

Key

CCFF: Complaint Counsel Proposed Findings of Fact

CCRF: Complaint Counsel Reply Findings of Fact

RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
421	CCFF 643	RRFF 643
422	CCFF 644	RRFF 644
423	CCFF 645	RRFF 645
424	RRFF 646	RRFF 646
425	CCFF 647	RRFF 647
426	CCFF 648; RRFF 648	
427	CCFF 649	RRFF 649
428	CCFF 651	RRFF 651
429	CCFF 652	RRFF 652
430	CCFF 653	RRFF 653
431	CCFF 655	RRFF 655
432	RRFF 656	
433	CCFF 657; RRFF 657	
434	CCFF 658	RRFF 658
434	RRFF 658	
435	~	
437	CCFF 1501	RRFF 1501
438	CCFF 1502	RRFF 1502
439	CCFF 1503	RRFF 1503
440	CCFF 1504*; RRFF 1504	
441	CCFF 1505*	RRFF 1505
442	CCFF 1512	RRFF 1512
443	CCFF 1513	RRFF 1513
444	CCFF 1517	RRFF 1517
445	CCFF 1507	RRFF 1507
446	CCFF 1511	RRFF 1511
447	CCFF 1521	RRFF 1521
448	CCFF 1522 *	RRFF 1522
449	CCFF 1522 *	RRFF 1522
450	CCFF 1523	RRFF 1523
451	CCFF 1525	RRFF 1525
452	CCFF 1526*; CCFF 1527	RRFF 1526-27
453	CCFF 1528	RRFF 1528
454	CCFF 1529; RRFF 1529	

Key

CCFF: Complaint Counsel Proposed Findings of Fact

CCRF: Complaint Counsel Reply Findings of Fact

RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
455	CCFF 1531*	RRFF 1531
456	CCFF 1532*	RRFF 1532
457	~	
458	CCFF 1540	RRFF 1540
459	CCFF 1541	RRFF 1541
460	RRFF 1542	
461	CCFF 1543	RRFF 1543
462	CCFF 1544; RRFF 1544	
463	CCFF 1550	RRFF 1550
464	CCFF 1555*	RRFF 1555
465	CCFF 1556	RRFF 1556
466	RRFF 1556	
467	RRFF 1514	
468	RRFF 1514	
469	RRFF 1514	
470	CCFF 1557	RRFF 1557
471	CCFF 1563	RRFF 1563
472	CCFF 1565	RRFF 1565
473	CCFF 1567	RRFF 1567
474	RRFF 1568	
475	CCFF 1569	RRFF 1569
476	RRFF 1570	
477	RRFF 1570	
478	RRFF 1570	
479	CCFF 1577	RRFF 1577
480	CCFF 1579*	RRFF 1579
481	CCFF 1579*	RRFF 1579
482	CCFF 1583	RRFF 1583
483	CCFF 1585	RRFF 1585
484	RRFF 1586	
485	RRFF 1586	
486	CCFF 1587	RRFF 1587
487	CCFF 1600; RRFF 1600	
488	RRFF 1600	
489	CCFF 1604; RRFF 1604	
490	CCFF 1605	RRFF 1605

Key

CCFF: Complaint Counsel Proposed Findings of Fact

CCRF: Complaint Counsel Reply Findings of Fact

RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
491	RRFF 1603	
492	RRFF 1606	
493	CCFF 1606	RRFF 1606
494	CCFF 1607	RRFF 1607
495	CCFF 1610	RRFF 1610
496	CCFF 1611	RRFF 1611
497	CCFF 1612	RRFF 1612
498	CCFF 1613	RRFF 1613
499	CCFF 1614; RRFF 1614	
500	CCFF 1615	RRFF 1615
501	CCFF 1825	RRFF 1825
502	CCFF 1827	RRFF 1827
503	CCFF 1828	RRFF 1828
504	CCFF 1830	RRFF 1830
505	CCFF 1832	RRFF 1832
506	CCFF 1833	RRFF 1833
507	RRFF 1836	
508	CCFF 1801; RRFF 1801	
509	RRFF 1806	
510	CCFF 1807*	RRFF 1807
511	CCFF 1808	RRFF 1808
512	CCFF 1809	RRFF 1809
513	RFF 1592	CCRF 1592
514	CCFF 1811; RRFF 1811	
515	RRFF 1813	
516	RRFF 1813	
517	CCFF 1840; RRFF 1840	
518	RFF 1581	CCRF 1581
519	RFF 1597	CCRF 1597
520	CCFF 1841; RRFF 1841	
521	RRFF 1845	
522	CCFF 1849	RRFF 1849
523	RRFF 1850	

Key

CCFF: Complaint Counsel Proposed Findings of Fact

CCRF: Complaint Counsel Reply Findings of Fact

RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
524	CCFF 1851*; CCFF 1853*	RRFF 1851; RRFF 1853
525	RRFF 1861	
526	RFF 1555-56	CCRF 1555-56
527	RFF 1557; CCRF 1557	
528	RFF 1558	CCRF 1558
529	RFF 1559	CCRF 1559
530	RFF 1561	CCRF 1561
531	RFF 1562	CCRF 1562
532	RFF 1563	CCRF 1563
533	RFF 1565	CCRF 1565
534	RFF 1566	CCRF 1566
535	RFF 1567	CCRF 1567
536	RFF 1568	CCRF 1568
537	RFF 1569	CCRF 1569
538	RFF 1570	CCRF 1570
539	RFF 1571	CCRF 1571
540	RFF 1572	CCRF 1572
541	RFF 1573	CCRF 1573
542	RFF 1574	CCRF 1574
543	RFF 1575	CCRF 1575
544	RFF 1576*	CCRF 1576
545	RFF 1577	CCRF 1577
546	RFF 1578	CCRF 1578
547	RFF 1579*	CCRF 1579
548	RFF 1580	CCRF 1580
549	RFF 1583*	CCRF 1583
550	RFF 1585*	CCRF 1585
551	RFF 1593*	CCRF 1593
552	RFF 1593*	CCRF 1593
553	RFF 1594	CCRF 1594
554	RFF 1595	CCRF 1595
555	RFF 1596	CCRF 1596
556	RFF 1598	CCRF 1598
557	RFF 1599	CCRF 1599
558	RFF 1600*	CCRF 1600
559	RFF 1601	CCRF 1601

Key

CCFF: Complaint Counsel Proposed Findings of Fact

CCRF: Complaint Counsel Reply Findings of Fact

RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
560	CCFF 1864	RRFF 1864
561	CCFF 1865	RRFF 1865
562	CCFF 1866	RRFF 1866
563	CCFF 1869	RRFF 1869
564	CCFF 1872	RRFF 1872
565	CCFF 1874; RRFF 1874	
566	CCFF 1875	RRFF 1875
567	CCFF 1878	RRFF 1878
568	CCFF 1880-81	RRFF 1880-81
569	RRFF 1882	RRFF 1882
570	CCFF 1884; RRFF 1884	
571	CCFF 1885	RRFF 1885
572	CCFF 1886	RRFF 1886
573	CCFF 1914	RRFF 1914
574	CCFF 1915	RRFF 1915
575	CCFF 1917	RRFF 1917
576	CCFF 1895*	RRFF 1895
577	CCFF 1895*	RRFF 1895
578	CCFF 1896	RRFF 1896
579	CCFF 1897	RRFF 1897
580	CCFF 1898	RRFF 1898
581	CCFF 1899	RRFF 1899
582	CCFF 1906*	RRFF 1906
583	RRFF 1808	
584	RRFF 1910	
585	CCFF 1908	RRFF 1908
586	RRFF 1914	
587	CCFF 310*	RRFF 310
588	RRFF 310*	
589	~	
590	RRFF 315*	
591	RRFF 310*	
592	CCFF 310*	RRFF 310
593	RRFF 311*	
594	RRFF 312*	
595	CCFF 312*	RRFF 312

Key

CCFF: Complaint Counsel Proposed Findings of Fact

CCRF: Complaint Counsel Reply Findings of Fact

RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
596	~	
597	~	
598	CCFF 300*	RRFF 300
599	RRFF 301*	
600	~	
601	CCFF 347*	RRFF 347
602	CCFF 355*	RRFF 355
603	CCFF 355*	RRFF 355
604	RFF 199	CCRF 199
605	RFF 434*	CCRF 434
606	RFF 160*	CCRF 160
607	RRFF 308*	
608	CCFF 406*	RRFF 406
609	~	
610	RFF 115*; CCRF 115*	
611	~	
612	~	
613	~	
614	~	
615	~	
616	CCRF 319*	
617	~	
618	RFF 171*	CCRF 171
619	~	
620	~	
621	~	
622	~	
623	~	
624	~	
625	RFF 173	CCRF 173
626	RFF 173*; CCRF 173*	
627	RFF 118, 166-67	CCRF 118, 166-67
628	RRFF 308	
629	RRFF 418	
630	~	
631	~	

Key

CCFF: Complaint Counsel Proposed Findings of Fact

CCRF: Complaint Counsel Reply Findings of Fact

RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
632	~	
633	~	
634	RFF 132	CCRF 132
635	RFF 134	CCRF 134
636	RFF 138	CCRF 138
637	CCRF 133	
638	RFF 133	CCRF 133
639	~	
640	RFF 209	CCRF 209
641	CCFF 438	RRFF 438
642	RFF 212	CCRF 212
643	~	
644	~	
645	CCRF 125*	
646	RFF 162*	CCRF 162
647	~	
648	CCFF 375	RRFF 375
649	~	
650	CCFF 380*	RRFF 380
651	RFF 134*	CCRF 134
652	CCFF 377*	RRFF 377
653	RRFF 320*	
654	~	
655	RFF 182*	CCRF 182
656	RFF 183	CCRF 183
657	~	
658	~	
659	RFF 123*	CCRF 123
660	CCRF 123*	
661	CCRF 123*	
662	~	
663	~	
664	~	
665	~	
666	CCFF 367*	RRFF 367
667	CCFF 368*	RRFF 368
668	CCFF 369*	RRFF 369
669	~	

Key

CCFF: Complaint Counsel Proposed Findings of Fact

CCRF: Complaint Counsel Reply Findings of Fact

RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
670	CCRF 187*	
671	RFF 187-88*	CCRF 187-88
672	~	
673	RFF 149-50*	CCRF 149-50
674	~	
675	RRFF 353*	
676	RFF 151*	CCRF 151
677	RFF 153*	CCRF 153
678	RFF 157*	CCRF 157
679	~	
680	CCRF 191*	
681	CCRF 191*	
682	CCRF 191*	
683	RFF 234	CCRF 234
684	RFF 237	CCRF 237
685	~	
686	CCFF 433*	RRFF 433
687	CCFF 433*	RRFF 433
688	CCFF 433*	RRFF 433
689	CCFF 434*	RRFF 434
690	CCFF 434*	RRFF 434
691	RFF 193	CCRF 193
692	RFF 194	CCRF 194
693	RFF 195	CCRF 195
694	RFF 196	CCRF 196
695	~	
696	RFF 240	CCRF 240
697	RFF 200*	CCRF 200
698	~	
699	RFF 241*	CCRF 241
700	~	
701	~	
702	~	
703	CCFF 429*	RFF 429
704	CCFF 428*	RFF 428
705	~	
706	~	
707	~	

Key

CCFF: Complaint Counsel Proposed Findings of Fact

CCRF: Complaint Counsel Reply Findings of Fact

RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

~: does not clearly correspond to proposed finding from either party

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
708	RFF 257*	CCRF 257
709	CCRF 257*	
710	~	
711	RFF 243	CCRF 243
712	RFF 244	CCRF 244
713	RFF 245	CCRF 245
714	RFF 245*	CCRF 245
715	RFF 246*	CCRF 246
716	RFF 247	CCRF 247
717	RFF 247*	CCRF 247
718	~	
719	~	
720	RRFF 320*	
721	~	
722	RRFF 320*	
723	~	
724	~	
725	~	
726	~	
727	~	
728	~	
729	~	
730	CCFF 363*	RRFF 363
731	~	
732	CCFF 408*	RRFF 408
733	~	
734	~	
735	~	
736	~	
737	~	
738	~	
739	CCFF 362*	RRFF 362
740	CCFF 202*	RRFF 202
741	~	
742	~	
743	~	
744	CCRF 219*	
745	~	

Key

CCFF: Complaint Counsel Proposed Findings of Fact

CCRF: Complaint Counsel Reply Findings of Fact

RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
746	~	
747	~	
748	~	
749	CCFF 320*	RRFF 320
750	CCFF 320*	RRFF 320
751	~	
752	~	
753	~	
754	RRFF 331*	
755	~	
756	RFF 284	CCRF 284
757	RFF 285	CCRF 285
758	CCFF 335	RRFF 335
759	~	
760	~	
761	~	
762	~	
763	RRFF 339*	
764	~	
765	CCFF 340*	RRFF 340
766	~	
767	~	
768	~	
769	~	
770	~	
771	~	
772	RFF 219*	CCRF 219
773	~	
774	RRFF 301*	
775	RFF 275-78	CCRF 275-78
776	~	
777	RRFF 335*	
778	RFF 285	CCRF 285
779	RFF 294	CCRF 294
780	RRFF 333*	
781	RFF 427	CCRF 427
782	RFF 415*	CCRF 415
783	CCFF 342*	RRFF 342

Key

CCFF: Complaint Counsel Proposed Findings of Fact

CCRF: Complaint Counsel Reply Findings of Fact

RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

~: does not clearly correspond to proposed finding from either party

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
784	RFF 297*, 298*; CCRF 297*	
785	RFF 298*	CCRF 298
786	RFF 468	CCRF 468
787	RFF 469	CCRF 469
788	RFF 470	CCRF 470
789	RFF 471	CCRF 471
790	RFF 472	CCRF 472
791	RFF 473	CCRF 473
792	RFF 474	CCRF 474
793	RFF 475	CCRF 475
794	RFF 476	CCRF 476
795	RFF 477	CCRF 477
796	RFF 478	CCRF 478
797	RFF 479-80	CCRF 479-80
798	RFF 481	CCRF 481
799	RFF 482	CCRF 482
800	RFF 484*	CCRF 484
801	RFF 485*	CCRF 485
802	RFF 486	CCRF 486
803	RFF 487	CCRF 487
804	RFF 488; CCRF 488	
805	RFF 489	CCRF 489
806	RFF 490	CCRF 490
807	RFF 491*	CCRF 491
808	RFF 492; CCRF 492	
809	~	
810	CCRF 769*; RFF 771*	CCRF 771
811	RFF 497	CCRF 497
812	RFF 498	CCRF 498
813	RFF 499	CCRF 499
814	RFF 500	CCRF 500
815	RFF 501	CCRF 501
816	RFF 503	CCRF 503
817	RFF 504	CCRF 504
818	RFF 505	CCRF 505
819	RFF 506	CCRF 506

Key

CCFF: Complaint Counsel Proposed Findings of Fact

CCRF: Complaint Counsel Reply Findings of Fact

RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
820	RFF 507	CCRF 507
821	RFF 508	CCRF 508
822	RFF 509	CCRF 509
823	RFF 510	CCRF 510
824	~	
825	RRFF 312	
826	RFF 517	CCRF 517
827	RFF 518	CCRF 518
828	CCRF 519	
829	RFF 522	CCRF 522
830	RFF 523	CCRF 523
831	RFF 525	CCRF 525
832	RFF 526	CCRF 526
833	RFF 527	CCRF 527
834	RFF 528	CCRF 528
835	RFF 529	CCRF 529
836	RFF 530*	CCRF 530
837	~	
838	RFF 716*	CCRF 716
839	RFF 530	CCRF 530
840	RFF 533	CCRF 533
841	RFF 534	CCRF 534
842	RFF 536*; CCRF 536*	
843	CCRF 536*	
844	CCRF 536	
845	CCRF 536*	
846	CCRF 537*; CCRF 537*	
847	CCRF 537*	
848	RFF 538	CCRF 538
849	RFF 539*	CCRF 539
850	RFF 539*	CCRF 539
851	RFF 540	CCRF 540
852	RFF 541	CCRF 541
853	RFF 542	CCRF 542
854	RFF 543	CCRF 543
855	RFF 544	CCRF 544

Key

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RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
856	RFF 547	CCRF 547
857	RFF 548	CCRF 548
858	~	
859	RFF 550	CCRF 550
860	RFF 551	CCRF 551
861	RFF 552	CCRF 552
862	RFF 553	CCRF 553
863	RFF 554	CCRF 554
864	RFF 555	CCRF 555
865	RFF 556	CCRF 556
866	RFF 557	CCRF 557
867	RFF 558	CCRF 558
868	RFF 559	CCRF 559
869	RFF 520	CCRF 520
870	RFF 521	CCRF 521
871	RFF 6*, 7*; CCRF 7*	CCRF 6
872	~	
873	~	
874	RFF 560	CCRF 560
875	~	
876	~	
877	RFF 563	CCRF 563
878	RFF 564	CCRF 564
879	RFF 567	CCRF 567
880	RFF 568	CCRF 568
881	RFF 569	CCRF 569
882	RFF 571*	CCRF 571
883	RFF 572	CCRF 572
884	RFF 574	CCRF 574
885	RFF 575	CCRF 575
886	RFF 576	CCRF 576
887	RFF 577	CCRF 577
888	RFF 578	CCRF 578
889	RFF 579	CCRF 579
890	RFF 580	CCRF 580
891	RFF 581	CCRF 581
892	RFF 582	CCRF 582
893	RFF 583	CCRF 583

Key

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CCRF: Complaint Counsel Reply Findings of Fact

RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
894	RFF 584	CCRF 584
895	RFF 585	CCRF 585
896	RFF 586	CCRF 586
897	RFF 587	CCRF 587
898	RFF 588	CCRF 588
899	RFF 589	CCRF 589
900	RFF 592	CCRF 592
901	RFF 593	CCRF 593
902	~	
903	~	
904	RFF 418	CCRF 418
905	RFF 423*	CCRF 423
906	RFF 421	CCRF 421
907	RFF 424	CCRF 424
908	RFF 425	CCRF 425
909	RFF 426	CCRF 426
910	RFF 427	CCRF 427
911	RFF 429	CCRF 429
912	RFF 430	CCRF 430
913	RFF 431	CCRF 431
914	CCFF 758	RRFF 758
915	RRFF 833*	
916	RRFF 833*	
917	RRFF 833*	
918	CCFF 834	RRFF 834
919	RFF 433	CCRF 433
920	RFF 434	CCRF 434
921	RFF 435	CCRF 435
922	RFF 436	CCRF 436
923	RFF 437*; CCRF 437*	
924	RFF 438-39	CCRF 438-39
925	RFF 440	CCRF 440
926	RFF 441	CCRF 441
927	RFF 442	CCRF 442
928	RFF 443	CCRF 443
929	RFF 444	CCRF 444
930	RFF 448*	CCRF 448

Key

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
931	RFF 449	CCRF 449
932	RFF 450*	CCRF 450
933	RFF 451	CCRF 451
934	RFF 452	CCRF 452
935	RFF 454*	CCRF 454
936	RFF 456*	CCRF 456
937	RFF 457	CCRF 457
938	RFF 460	CCRF 460
939	RFF 327	CCRF 327
940	RFF 328*	CCRF 328
941	RFF 328*	CCRF 328
942	RFF 329	CCRF 329
943	RFF 332	CCRF 332
944	RFF 333	CCRF 333
945	RFF 335	CCRF 335
946	RFF 336	CCRF 336
947	RFF 337	CCRF 337
948	RFF 338	CCRF 338
949	RFF 339*	CCRF 339
950	RFF 340	CCRF 340
951	RFF 341	CCRF 341
952	RFF 343	CCRF 343
953	RFF 347*	CCRF 347
954	~	
955	RFF 349; CCRF 349	
956	RFF 350*	CCRF 350
957	~	
958	RFF 356	CCRF 356
959	RFF 361	CCRF 361
960	RFF 362	CCRF 362
961	RFF 363	CCRF 363
962	RFF 366	CCRF 366
963	RFF 371	CCRF 371
964	RFF 372*	CCRF 372
965	RFF 379	CCRF 379
966	RFF 380	CCRF 380
967	CCFF 1214*	RRFF 1214
968	RFF 398	CCRF 398

Key

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RFF: Respondant Proposed Finding of Fact

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
969	RFF 399	CCRF 399
970	RFF 400	CCRF 400
971	RFF 401	CCRF 401
972	RFF 402	CCRF 402
973	RFF 403	CCRF 403
974	RFF 404	CCRF 404
975	RFF 405	CCRF 405
976	RFF 406	CCRF 406
977	RFF 407	CCRF 407
978	RFF 408	CCRF 408
979	RFF 410	CCRF 410
980	RFF 411	CCRF 411
981	RFF 412	CCRF 412
982	RFF 415	CCRF 415
983	CCFF 1718	RRFF 1718
984	CCFF 1720	RRFF 1720
985	CCFF 1721	RRFF 1721
986	RRFF 1720	
987	CCFF 1722	RRFF 1722
988	CCFF 1723	RRFF 1723
989	CCFF 1725	RRFF 1725
990	CCFF 1727	RRFF 1727
991	CCFF 1731	RRFF 1731
992	CCFF 1732	RRFF 1732
993	RRFF 1728*	
994	CCFF 1733	RRFF 1733
995	CCFF 1737	RRFF 1737
996	CCFF 1734	RRFF 1734
997	CCFF 1735	RRFF 1735
998	CCFF 1739	RRFF 1739
999	CCFF 1740*	RRFF 1740
1000	CCFF 1741	RRFF 1741
1001	CCFF 1742	RRFF 1742
1002	CCFF 1745	RRFF 1745
1003	CCFF 1746	RRFF 1746
1004	CCFF 1747	RRFF 1747
1005	CCFF 1748	RRFF 1748
1006	CCFF 1749	RRFF 1749

Key

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
1007	CCFF 1750	RRFF 1750
1008	CCFF 1752	RRFF 1752
1009	CCFF 1753*; RRFF 1753*	
1010	CCFF 2763	RRFF 2763
1011	CCFF 2767-68	RRFF 2767-68
1012	CCFF 2769*	RRFF 2769
1013	CCFF 2787*	RRFF 2787
1014	CCFF 2885	RRFF 2885
1015	RRFF 2788	
1016	CCFF 2890	RRFF 2890
1017	CCFF 2891-2893	RRFF 2891-93
1018	CCFF 2889*	RRFF 2889
1019	CCFF 2900; RRFF 2900	
1020	CCFF 2913	RRFF 2913
1021	CCFF 2039*	RRFF 2039
1022	CCFF 1951*	RRFF 1951
1023	CCFF 1960	RRFF 1960
1024	CCFF 1962	RRFF 1962
1025	CCFF 1963	RRFF 1963
1026	CCFF 1965	RRFF 1965
1027	CCFF 1966	RRFF 1966
1028	CCFF 1967	RRFF 1967
1029	CCFF 1968	RRFF 1968
1030	RFF 1504	CCRF 1504
1031	RFF 1505	CCRF 1505
1032	RFF 1506	CCRF 1506
1033	RFF 1507	CCRF 1507
1034	RFF 1508	CCRF 1508
1035	RFF 1509	CCRF 1509
1036	RFF 1510	CCRF 1510
1037	RFF 1511	CCRF 1511
1038	RFF 1512	CCRF 1512
1039	RFF 1515	CCRF 1515
1040	RFF 1516	CCRF 1516
1041	RFF 1517	CCRF 1517
1042	~	

Key

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
1043	RFF 1518	CCRF 1518
1044	RFF 1519	CCRF 1519
1045	RFF 1520	CCRF 1520
1046	RFF 1521	CCRF 1521
1047	RFF 1522	CCRF 1522
1048	RFF 1523	CCRF 1523
1049	RFF 1524	CCRF 1524
1050	RFF 1525	CCRF 1525
1051	RFF 1526	CCRF 1526
1052	RFF 1532	CCRF 1532
1053	RFF 1533	CCRF 1533
1054	RFF 1534	CCRF 1532
1055	RFF 1537	CCRF 1537
1056	RFF 1539	CCRF 1539
1057	RFF 1540	CCRF 1540
1058	RFF 1541	CCRF 1541
1059	RFF 1542	CCRF 1542
1060	RFF 1543	CCRF 1543
1061	RFF 1544	CCRF 1544
1062	RFF 1545	CCRF 1545
1063	RFF 1546	CCRF 1546
1064	RFF 105*	CCRF 105
1065	RFF 458	CCRF 458
1066	RFF 1442*	CCRF 1442
1067	RFF 1443	CCRF 1443
1068	RFF 1444	CCRF 1444
1069	RFF 1442*	CCRF 1442
1070	RFF 1446	CCRF 1446
1071	RFF 1447	CCRF 1447
1072	RFF 1435	CCRF 1435
1073	RFF 1436	CCRF 1436
1074	RFF 1437*	CCRF 1437
1075	RFF 91	CCRF 91
1076	RFF 92*	CCRF 92
1077	RFF 92*	CCRF 92
1078	RFF 93	CCRF 93
1079	RFF 94	CCRF 94
1080	RFF 95	CCRF 95

Key

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
1081	RFF 96	CCRF 96
1082	RFF 97	CCRF 97
1083	RFF 99; CCRF 99	
1084	RFF 101	CCRF 101
1085	RFF 103	CCRF 103
1086	RFF 1441*	CCRF 1441
1087	RFF 1440	CCRF 1440
1088	RFF 1448	CCRF 1448
1089	RFF 1449; CCRF 1449	
1090	RFF 1450	CCRF 1450
1091	RFF 1452	CCRF 1452
1092	RFF 1453	CCRF 1453
1093	RFF 1454*	CCRF 1454
1094	RFF 1455	CCRF 1455
1095	RFF 1456	CCRF 1456
1096	RFF 1459	CCRF 1459
1097	RFF 1460	CCRF 1460
1098	RFF 1461	CCRF 1461
1099	RFF 1462	CCRF 1462
1100	RFF 1463	CCRF 1463
1101	RFF 1464	CCRF 1464
1102	RFF 1465	CCRF 1465
1103	RFF 1466	CCRF 1466
1104	RFF 1467	CCRF 1467
1105	RFF 1468; CCRF 726	CCRF 1468
1106	RFF 1470; CCRF 1470	
1107	RFF 1471	CCRF 1471
1108	RFF 1473*	CCRF 1473
1109	RFF 1474	CCRF 1474
1110	RFF 1476; CCRF 1476	
1111	RFF 1477	CCRF 1477
1112	RFF 1478	CCRF 1478
1113	RFF 1479	CCRF 1479
1114	RFF 1480	CCRF 1480
1115	RFF 1482	CCRF 1482

Key

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
1116	RFF 1483	CCRF 1483
1117	RFF 1484	CCRF 1484
1118	RFF 1485	CCRF 1485
1119	RFF 1487; CCRF 1487	
1120	RFF 1488	CCRF 1488
1121	RFF 1489	CCRF 1489
1122	RFF 1490*; RFF 1493*	CCRF 1490; CCRF 1493
1123	RFF 1494	CCRF 1494
1124	RFF 1495	CCRF 1495
1125	RFF 1497	CCRF 1497
1126	RFF 1498*	CCRF 1498
1127	RFF 1498*	CCRF 1498
1128	RFF 786	CCRF 786
1129	RFF 787	CCRF 787
1130	RFF 788	CCRF 788
1131	RFF 790	CCRF 790
1132	RFF 791	CCRF 791
1133	RFF 792	CCRF 792
1134	RFF 793	CCRF 793
1135	RFF 809	CCRF 809
1136	RFF 810	CCRF 810
1137	RFF 813	CCRF 813
1138	RFF 814	CCRF 814
1139	RFF 815	CCRF 815
1140	RFF 816	CCRF 816
1141	RFF 817	CCRF 817
1142	RFF 818	CCRF 818
1143	RFF 819*	CCRF 819
1144	RFF 819*	CCRF 819
1145	RFF 820	CCRF 820
1146	RFF 821	CCRF 821
1147	RFF 822	CCRF 822
1148	RFF 823	CCRF 823
1149	RFF 824	CCRF 824
1150	RFF 825	CCRF 825
1151	RFF 826	CCRF 826

Key

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
1152	RFF 827	CCRF 827
1153	RFF 828	CCRF 828
1154	RFF 829	CCRF 829
1155	RFF 830	CCRF 830
1156	RFF 831	CCRF 831
1157	RFF 832	CCRF 832
1158	RFF 833	CCRF 833
1159	RFF 834	CCRF 834
1160	RFF 835	CCRF 835
1161	RFF 836	CCRF 836
1162	RFF 837	CCRF 837
1163	RFF 838	CCRF 838
1164	RFF 839	CCRF 839
1165	RFF 840	CCRF 840
1166	RFF 843	CCRF 843
1167	RFF 844	CCRF 844
1168	RFF 845	CCRF 845
1169	RFF 846	CCRF 846
1170	RFF 847	CCRF 847
1171	RFF 848	CCRF 848
1172	RFF 850	CCRF 850
1173	RFF 851	CCRF 851
1174	RFF 852	CCRF 852
1175	RFF 853	CCRF 853
1176	RFF 854	CCRF 854
1177	RFF 855	CCRF 855
1178	RFF 856	CCRF 856
1179	RFF 859	CCRF 859
1180	RFF 860	CCRF 860
1181	RFF 861	CCRF 861
1182	RFF 862	CCRF 862
1183	RFF 863	CCRF 863
1184	RFF 865	CCRF 865
1185	RFF 866	CCRF 866
1186	RFF 867	CCRF 867
1187	RFF 868	CCRF 868
1188	RFF 871	CCRF 871
1189	RFF 872	CCRF 872

Key

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
1190	RFF 873	CCRF 873
1191	RFF 874	CCRF 874
1192	RFF 875	CCRF 875
1193	RFF 876	CCRF 876
1194	RFF 877	CCRF 877
1195	RFF 878	CCRF 878
1196	RFF 879	CCRF 879
1197	RFF 880	CCRF 880
1198	RFF 881	CCRF 881
1199	RFF 882	CCRF 882
1200	RFF 883	CCRF 883
1201	RFF 884	CCRF 884
1202	RFF 887	CCRF 887
1203	RFF 889	CCRF 889
1204	RFF 890	CCRF 890
1205	RFF 891	CCRF 891
1206	RFF 892	CCRF 892
1207	RFF 895	CCRF 895
1208	RFF 896	CCRF 896
1209	RFF 897	CCRF 897
1210	RFF 898	CCRF 898
1211	RFF 899	CCRF 899
1212	RFF 900	CCRF 900
1213	RFF 901	CCRF 901
1214	RFF 902	CCRF 902
1215	RFF 903	CCRF 903
1216	RFF 904	CCRF 904
1217	RFF 907	CCRF 907
1218	RFF 908	CCRF 908
1219	RFF 909	CCRF 909
1220	RFF 910	CCRF 910
1221	RFF 911	CCRF 911
1222	RFF 912	CCRF 912
1223	RFF 913	CCRF 913
1224	RFF 914	CCRF 914
1225	RFF 916	CCRF 916
1226	RFF 917	CCRF 917
1227	RFF 918	CCRF 918

Key

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RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
1228	RFF 919	CCRF 919
1229	RFF 920	CCRF 920
1230	RFF 921	CCRF 921
1231	RFF 922	CCRF 922
1232	RFF 925	CCRF 925
1233	RFF 926	CCRF 926
1234	RFF 928	CCRF 928
1235	RFF 929	CCRF 929
1236	RFF 930	CCRF 930
1237	RFF 931	CCRF 931
1238	RFF 932	CCRF 932
1239	RFF 933	CCRF 933
1240	RFF 936	CCRF 936
1241	RFF 937	CCRF 937
1242	RFF 938	CCRF 937
1243	RFF 940	CCRF 940
1244	RFF 941	CCRF 941
1245	RFF 942	CCRF 942
1246	RFF 943	CCRF 943
1247	RFF 946	CCRF 946
1248	RFF 947	CCRF 947
1249	RFF 950	CCRF 950
1250	RFF 951	CCRF 951
1251	RFF 952	CCRF 952
1252	RFF 953	CCRF 953
1253	RFF 954	CCRF 954
1254	RFF 955	CCRF 955
1255	RFF 956	CCRF 956
1256	RFF 957	CCRF 957
1257	RFF 958	CCRF 958
1258	RFF 962	CCRF 962
1259	RFF 963	CCRF 963
1260	RFF 969	CCRF 969
1261	RFF 970	CCRF 970
1262	RFF 971	CCRF 971
1263	RFF 972	CCRF 972
1264	RFF 973	CCRF 973
1265	RFF 974	CCRF 974

Key

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RFF: Respondant Proposed Finding of Fact

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
1266	RFF 975	CCRF 975
1267	RFF 976	CCRF 976
1268	RFF 977	CCRF 977
1269	RFF 978	CCRF 978
1270	RFF 979	CCRF 979
1271	RFF 980	CCRF 980
1272	RFF 981	CCRF 981
1273	RFF 982	CCRF 982
1274	RFF 983	CCRF 983
1275	RFF 984	CCRF 984
1276	RFF 985	CCRF 985
1277	RFF 986	CCRF 986
1278	RFF 987	CCRF 987
1279	RFF 988	CCRF 988
1280	RFF 990	CCRF 990
1281	RFF 991	CCRF 991
1282	RFF 994	CCRF 994
1283	RFF 995	CCRF 995
1284	RFF 996	CCRF 996
1285	RFF 997	CCRF 997
1286	RFF 1000	CCRF 1000
1287	RFF 1002	CCRF 1002
1288	RFF 1003	CCRF 1003
1289	RFF 1004	CCRF 1004
1290	RFF 1005	CCRF 1005
1291	RFF 1006	CCRF 1006
1292	RFF 1007	CCRF 1007
1293	RFF 1010	CCRF 1010
1294	RFF 1011*	CCRF 1011
1295	RFF 1011*	CCRF 1011
1296	RFF 1012*	CCRF 1012
1297	RFF 1012*	CCRF 1012
1298	RFF 1013	CCRF 1013
1299	RFF 1014	CCRF 1014
1300	RFF 1015	CCRF 1015
1301	RFF 1017	CCRF 1017
1302	RFF 1018	CCRF 1018
1303	RFF 1019	CCRF 1019

Key

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
1304	RFF 1020	CCRF 1020
1305	RFF 1021	CCRF 1021
1306	RFF 1022	CCRF 1022
1307	RFF 1025	CCRF 1025
1308	RFF 1026	CCRF 1026
1309	RFF 1027	CCRF 1027
1310	RFF 1028	CCRF 1028
1311	RFF 1029	CCRF 1029
1312	RFF 1030	CCRF 1030
1313	RFF 1031	CCRF 1031
1314	RFF 1032	CCRF 1032
1315	RFF 1033	CCRF 1033
1316	RFF 1034	CCRF 1034
1317	RFF 1035	CCRF 1035
1318	RFF 1038	CCRF 1038
1319	RFF 1039	CCRF 1039
1320	RFF 1040	CCRF 1040
1321	RFF 1041	CCRF 1041
1322	RFF 1042	CCRF 1042
1323	RFF 1045	CCRF 1045
1324	RFF 1046	CCRF 1046
1325	RFF 1047	CCRF 1047
1326	RFF 1048	CCRF 1048
1327	RFF 1049	CCRF 1049
1328	RFF 1050	CCRF 1050
1329	RFF 1051	CCRF 1051
1330	RFF 1052	CCRF 1052
1331	RFF 1054	CCRF 1054
1332	RFF 1055	CCRF 1055
1333	RFF 1056	CCRF 1056
1334	RFF 1057	CCRF 1057
1335	RFF 1058	CCRF 1058
1336	RFF 1060	CCRF 1060
1337	RFF 1062	CCRF 1062
1338	RFF 1063	CCRF 1063
1339	RFF 1064	CCRF 1064
1340	RFF 1065	CCRF 1065
1341	RFF 1066	CCRF 1066

Key

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RFF: Respondant Proposed Finding of Fact

RRFF: Respondant Reply Finding of Fact

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
1342	RFF 1067	CCRF 1067
1343	RFF 1070	CCRF 1070
1344	RFF 1071	CCRF 1071
1345	RFF 1073	CCRF 1073
1346	RFF 1074	CCRF 1074
1347	RFF 1075	CCRF 1075
1348	RFF 1076	CCRF 1076
1349	RFF 1077	CCRF 1077
1350	RFF 1078	CCRF 1078
1351	RFF 1079	CCRF 1079
1352	RFF 1080	CCRF 1080
1353	RFF 1081	CCRF 1081
1354	RFF 1082	CCRF 1082
1355	RFF 1083	CCRF 1083
1356	RFF 1084	CCRF 1084
1357	RFF 1085	CCRF 1085
1358	RFF 1086	CCRF 1086
1359	RFF 1089	CCRF 1089
1360	RFF 1090	CCRF 1090
1361	RFF 1091	CCRF 1091
1362	RFF 1094	CCRF 1094
1363	RFF 1095	CCRF 1095
1364	RFF 1096	CCRF 1096
1365	RFF 1098	CCRF 1098
1366	RFF 1099	CCRF 1099
1367	RFF 1100	CCRF 1100
1368	RFF 1101	CCRF 1101
1369	RFF 1102	CCRF 1102
1370	RFF 1103	CCRF 1103
1371	RFF 1106	CCRF 1106
1372	RFF 1107	CCRF 1107
1373	RFF 1108	CCRF 1108
1374	RFF 1109	CCRF 1109
1375	RFF 1110	CCRF 1110
1376	RFF 1111*	CCRF 1111
1377	RFF 1111*	CCRF 1111
1378	RFF 1112	CCRF 1112
1379	RFF 1113	CCRF 1113

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
1380	RFF 1114	CCRF 1114
1381	RFF 1115	CCRF 1115
1382	RFF 1118	CCRF 1118
1383	RFF 1119	CCRF 1119
1384	RFF 1120	CCRF 1120
1385	CCFF 2411	RRFF 2411
1386	RRFF 2411	
1387	RRFF 2411	
1388	RFF 1125	CCRF 1125
1389	RFF 1126	CCRF 1126
1390	RFF 1127	CCRF 1127
1391	RFF 1128	CCRF 1128
1392	RFF 1129	CCRF 1129
1393	RFF 1130	CCRF 1130
1394	RFF 1131	CCRF 1131
1395	RFF 1132	CCRF 1132
1396	RFF 1133	CCRF 1133
1397	RFF 1134	CCRF 1134
1398	RFF 1135	CCRF 1135
1399	RFF 1136	CCRF 1136
1400	RFF 1137	CCRF 1137
1401	RFF 1138*	CCRF 1138
1402	RFF 1139	CCRF 1139
1403	RFF 1148-1149	CCRF 1148-49
1404	RFF 1150	CCRF 1150
1405	RFF 1151	CCRF 1151
1406	RFF 1152	CCRF 1152
1407	RFF 1153	CCRF 1153
1408	RFF 1154	CCRF 1154
1409	RFF 1155	CCRF 1155
1410	RFF 1156	CCRF 1156
1411	RFF 1157*	CCRF 1157
1412	RFF 1157*	CCRF 1157
1413	RFF 1158	CCRF 1158
1414	RFF 1159*	CCRF 1159
1415	RFF 1159*	CCRF 1159
1416	RFF 1160	CCRF 1160
1417	RFF 1161	CCRF 1161

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
1418	RFF 1162	CCRF 1162
1419	RFF 1163	CCRF 1163
1420	RFF 1165	CCRF 1165
1421	RFF 1166	CCRF 1166
1422	RFF 1167	CCRF 1167
1423	RFF 1168	CCRF 1168
1424	RFF 1169	CCRF 1169
1425	RFF 1170	CCRF 1170
1426	RFF 1172*	CCRF 1172
1427	RFF 1173	CCRF 1173
1428	RFF 1174	CCRF 1174
1429	RFF 1175	CCRF 1175
1430	RFF 1176	CCRF 1176
1431	RFF 1177	CCRF 1177
1432	RFF 1179	CCRF 1179
1433	RFF 1180	CCRF 1180
1434	RFF 1181	CCRF 1181
1435	RFF 1184	CCRF 1184
1436	RFF 1186	CCRF 1186
1437	RFF 1187	CCRF 1187
1438	RFF 1188	CCRF 1188
1439	RFF 1189	CCRF 1189
1440	RFF 1191	CCRF 1191
1441	RFF 1192	CCRF 1192
1442	RFF 1193	CCRF 1193
1443	RFF 1194	CCRF 1194
1444	RFF 1195	CCRF 1195
1445	RFF 1196	CCRF 1196
1446	RFF 1197	CCRF 1197
1447	RFF 1198	CCRF 1198
1448	RFF 1199	CCRF 1199
1449	RFF 1200	CCRF 1200
1450	RFF 1201	CCRF 1201
1451	RFF 1203	CCRF 1203
1452	RFF 1204	CCRF 1204
1453	RFF 1207	CCRF 1207
1454	RFF 1208	CCRF 1208
1455	RFF 1213	CCRF 1213

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
1456	RFF 1210	CCRF 1210
1457	RFF 1211	CCRF 1211
1458	RFF 1212	CCRF 1212
1459	RFF 1213	CCRF 1213
1460	RFF 1214	CCRF 1214
1461	RFF 1215	CCRF 1215
1462	RFF 1216	CCRF 1216
1463	RFF 1217	CCRF 1217
1464	RFF 1219*	CCRF 1219
1465	RFF 1219*	CCRF 1219
1466	RFF 1220	CCRF 1220
1467	RFF 1221	CCRF 1221
1468	RFF 1223	CCRF 1223
1469	RFF 1225	CCRF 1225
1470	RFF 1226	CCRF 1226
1471	RFF 1227	CCRF 1227
1472	RFF 1228	CCRF 1228
1473	RFF 1229	CCRF 1229
1474	RFF 1230	CCRF 1230
1475	RFF 1231	CCRF 1231
1476	RFF 1232	CCRF 1232
1477	RFF 1233	CCRF 1233
1478	RFF 1234	CCRF 1234
1479	RFF 1235	CCRF 1235
1480	RFF 1238	CCRF 1238
1481	RFF 1239	CCRF 1239
1482	RFF 1240	CCRF 1240
1483	RFF 1243*	CCRF 1243
1484	RFF 1243*	CCRF 1243
1485	RFF 1244	CCRF 1244
1486	RFF 724	CCRF 724
1487	RFF 725	CCRF 725
1488	RFF 726	CCRF 726
1489	RFF 727	CCRF 727
1490	RFF 728	CCRF 728
1491	RFF 730	CCRF 730
1492	CCFF 3230	RRFF 3230
1493	RFF 740	CCRF 740

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
1494	RFF 741	CCRF 741
1495	RFF 734	CCRF 734
1496	RFF 735	CCRF 735
1497	RFF 736	CCRF 736
1498	RFF 737	CCRF 737
1499	RFF 738	CCRF 738
1500	RFF 747	CCRF 747
1501	RFF 748	CCRF 748
1502	RFF 742	CCRF 742
1503	RFF 743	CCRF 743
1504	RFF 744	CCRF 744
1505	RFF 749	CCRF 749
1506	RFF 750	CCRF 750
1507	RFF 751	CCRF 751
1508	RFF 752	CCRF 752
1509	RFF 753	CCRF 753
1510	RFF 755	CCRF 755
1511	RFF 756	CCRF 756
1512	RFF 757	CCRF 757
1513	RFF 758	CCRF 758
1514	RFF 759	CCRF 759
1515	RFF 760	CCRF 760
1516	RFF 761	CCRF 761
1517	RFF 762	CCRF 762
1518	RFF 763	CCRF 763
1519	~	
1520	~	
1521	RFF 766*	CCRF 766
1522	RFF 766*	CCRF 766
1523	RFF 769	CCRF 769
1524	RFF 770	CCRF 770
1525	RFF 771	CCRF 771
1526	RFF 772	CCRF 772
1527	RFF 773	CCRF 773
1528	RFF 774	CCRF 774
1529	RFF 775	CCRF 775
1530	RFF 776	CCRF 776
1531	RFF 777	CCRF 777

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
1532	RFF 778	CCRF 778
1533	RFF 779	CCRF 779
1534	RFF 780	CCRF 780
1535	RFF 781	CCRF 781
1536	RFF 1365	CCRF 1365
1537	RFF 1366	CCRF 1366
1538	RFF 1367	CCRF 1367
1539	RFF 1368	CCRF 1368
1540	RFF 1369	CCRF 1369
1541	RFF 1370	CCRF 1370
1542	RFF 1372	CCRF 1372
1543	RFF 1373	CCRF 1373
1544	RFF 1374	CCRF 1374
1545	RFF 1375	CCRF 1375
1546	RFF 1377*	CCRF 1377
1547	RFF 1377*	CCRF 1377
1548	RFF 1378	CCRF 1378
1549	RFF 1379	CCRF 1379
1550	RFF 1380	CCRF 1380
1551	RFF 1381	CCRF 1381
1552	RFF 1382	CCRF 1382
1553	RFF 1383	CCRF 1383
1554	RFF 1384	CCRF 1384
1555	RFF 1385	CCRF 1385
1556	RFF 1386	CCRF 1386
1557	RFF 1392	CCRF 1392
1558	RFF 1393	CCRF 1393
1559	RFF 1395	CCRF 1395
1560	RFF 1396	CCRF 1396
1561	RFF 1398	CCRF 1398
1562	RFF 1399	CCRF 1399
1563	RFF 1400	CCRF 1400
1564	RFF 1402	CCRF 1402
1565	RFF 1403	CCRF 1403
1566	RFF 1404	CCRF 1404
1567	~	
1568	RFF 1406	CCRF 1406
1569	RFF 1407	CCRF 1407

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
1570	RFF 1408	CCRF 1408
1571	RFF 1409	CCRF 1409
1572	RFF 1410	CCRF 1410
1573	RFF 1411	CCRF 1411
1574	RFF 1412	CCRF 1412
1575	RFF 1415	CCRF 1415
1576	RFF 1416	CCRF 1416
1577	RFF 1417	CCRF 1417
1578	RFF 1418	CCRF 1418
1579	RFF 1419	CCRF 1419
1580	RFF 1420	CCRF 1420
1581	RFF 1421	CCRF 1421
1582	RFF 1260	CCRF 1260
1583	RFF 1261	CCRF 1261
1584	RFF 1262	CCRF 1262
1585	RFF 1263	CCRF 1263
1586	RFF 1268	CCRF 1268
1587	RFF 1269	CCRF 1269
1588	RFF 1270	CCRF 1270
1589	RFF 1271	CCRF 1271
1590	RFF 1272	CCRF 1272
1591	RFF 1273	CCRF 1273
1592	RFF 1274	CCRF 1274
1593	RFF 1275	CCRF 1275
1594	RFF 1276	CCRF 1276
1595	RFF 1277	CCRF 1277
1596	RFF 1279	CCRF 1279
1597	RFF 1280	CCRF 1280
1598	RFF 1281	CCRF 1281
1599	RFF 1282	CCRF 1282
1600	RFF 1283	CCRF 1283
1601	RFF 1284	CCRF 1284
1602	RFF 1285	CCRF 1285
1603	RFF 1286	CCRF 1286
1604	RFF 1288	CCRF 1288
1605	RFF 1289	CCRF 1289
1606	RFF 1290	CCRF 1290
1607	RFF 1291	CCRF 1291

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
1608	RFF 1292	CCRF 1292
1609	RFF 1293	CCRF 1293
1610	RFF 1294	CCRF 1294
1611	RFF 1295	CCRF 1295
1612	RFF 1296	CCRF 1296
1613	RFF 1297	CCRF 1297
1614	RFF 1298	CCRF 1298
1615	RFF 1299	CCRF 1299
1616	RFF 1300	CCRF 1300
1617	RFF 1301	CCRF 1301
1618	RFF 1302	CCRF 1302
1619	RFF 1303	CCRF 1303
1620	RFF 1304	CCRF 1304
1621	RFF 1305	CCRF 1305
1622	RFF 1306	CCRF 1306
1623	RFF 1307	CCRF 1307
1624	RFF 1309	CCRF 1309
1625	RFF 1311	CCRF 1311
1626	RFF 1312	CCRF 1312
1627	RFF 1313	CCRF 1313
1628	RFF 1314	CCRF 1314
1629	RFF 1315	CCRF 1315
1630	RFF 1316	CCRF 1316
1631	RFF 1317	CCRF 1317
1632	RFF 1318	CCRF 1318
1633	RFF 1319	CCRF 1319
1634	RFF 1320	CCRF 1320
1635	RFF 1321	CCRF 1321
1636	RFF 1322	CCRF 1322
1637	RFF 1323	CCRF 1323
1638	RFF 1324	CCRF 1324
1639	RFF 1325	CCRF 1325
1640	RFF 1326	CCRF 1326
1641	RFF 1327	CCRF 1327
1642	RFF 1328	CCRF 1328
1643	RFF 1329	CCRF 1329
1644	RFF 1331	CCRF 1331
1645	RFF 1332	CCRF 1332

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ALJ Finding	Based on	Corresponding Reply Finding (if applicable)
1646	RFF 1334	CCRF 1334
1647	RFF 1335	CCRF 1335
1648	RFF 1336	CCRF 1336
1649	RFF 1337	CCRF 1337
1650	RFF 1338	CCRF 1338
1651	RFF 1339	CCRF 1339
1652	RFF 1340	CCRF 1340
1653	RFF 1341	CCRF 1341
1654	RFF 1342	CCRF 1342
1655	RFF 1343	CCRF 1343
1656	RFF 1344	CCRF 1344
1657	RFF 1345	CCRF 1345
1658	RFF 1346	CCRF 1346
1659	RFF 1348	CCRF 1348
1660	RFF 1349	CCRF 1349
1661	RFF 1350	CCRF 1350
1662	RFF 1351	CCRF 1351
1663	RFF 1352	CCRF 1352
1664	RFF 1353	CCRF 1353
1665	RFF 1354	CCRF 1354

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