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# ALTERNATIVE DISPUTE RESOLUTION

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**ACADEMY**

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# **CERTIFICATE OF COMPLETION**

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Is *Awarded To*

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Richard Phillips

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For Course

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Appellate Court Mediation, No Show, Good  
Cause and Sanctions (1CME Appellate)

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Guno Ritfeld, JD

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Certificate

3656-10125-1729

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May 10, 2018

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