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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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Steve Putnam

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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

3656-10125-2542

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January 8, 2020

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