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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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Jonathan Zahler

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For Course

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How Enforceable Is that Mediated Agreement?  
(2CME Gen or 2 CME Ethics) –  
Recorded

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Guno Ritfeld, JD

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Certificate

3656-2314-2583

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September 27, 2019

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