



# Animal Law Podcast: Transcript for Episode 85, Interview with Brooke Dekolf & Dije Ndreu

**Mariann Sullivan:** Welcome to Our Hen House, Dije and Brooke.

**Brooke Dekolf:** Thanks so much for having us.

**Dije Ndreu:** Hi, nice to be here.

**Mariann:** Super excited to have you! Super excited to always talk with the folks from Richmond Law. And of course we're talking about another consumer protection case. Consumer protection has become such an important factor in animal law.

And just as a way to start out, because I like to start out with talking about the facts of the case, let's start with the package. As if somebody went into Aldi's and, and saw this package that you have brought these lawsuits about, what would they see?

**Brooke:** So right on front of product packaging, they would see the labeling would say simple, sustainable seafood and that's marketed front of product packaging on all of their frozen salmon products, Atlantic salmon products.

**Mariann:** And there's also something called B-A-P certification. That's on the label as well, right? What does that mean?

**Brooke:** So B-A-P, best aquaculture practices, is an industry trade group that certifies some finfish products and other types of fish products. They set a set of standards for what they consider to be the best environmental and sustainability practices for their producers.

**Mariann:** So it's basically an industry standard. Is this typical of third party standards for aquaculture, third party certification standards for aquaculture?

And don't worry, we'll get into, in a minute, exactly what was happening here that got certified by B-A-P. Which I've never heard of, I have to say.

**Dije:** It's actually the Global Seafood Alliance. That's the trade industry group that issues the BAP. So it's like their product. And as you can imagine, the Global Seafood Alliance, they actually say on their web page, "We are an ally to the seafood industry."

**Mariann:** So were these claims about "this is sustainable," and we'll talk about a little bit what that means. And "this is BAP certified," talk about what that means. Were they also found in their advertising or it's just on the packages?

**Dije:** Yeah, there are additional claims on their website. There are two different cases.

There is the nonprofit association case, TFUSA. And in that case, that also concerns website representations. But for the class action case, it's simpler to just focus on the labeling. But there were actually additional representations made on all these website.

**Mariann:** That's what it looks like in Aldi. So let's get into the nitty gritty here.

Tell us a little bit about where this salmon actually comes from.

**Brooke:** So plaintiffs alleged that the salmon comes in part from Chile. Salmon are not native to Chile so they use a form of aquaculture production known as net pen aquaculture, where the fish are essentially raised in these cages or crates or nets, whatever you want to call them, that are connected directly to open ocean or open water. And that's the type of aquaculture that's at issue here.

**Mariann:** What are the lives of these salmon like?

**Brooke:** It's a really unfortunate place to be for these salmon. As I said, salmon are not naturally in this type of environment. The net pens themselves are incredibly barren so there's no form of enrichment for the salmon.

They don't have access to different smells, different experiences, places to hide. The stocking density is also quite high, so the fish are really just crowded right next to each other. Combined with a really barren environment it can lead to aggression amongst fish. Fish that are trying to escape from other fish because of the increased aggression have nowhere to go, nowhere to hide. So they're more susceptible to bullying, that sort of thing.

Because of the open water nature of the net pens fish often escape. They can bring diseases and their own predation effects into the wild environment. And just because these net pens are so highly, highly stocked in such a high density confinement type of situation the fishes themselves are particularly susceptible to disease, stress, things that you would expect when you're really, really closely crowded together.

**Mariann:** What kind of diseases do they suffer from?

**Brooke:** So one of the most common is sea lice infestations. These infestations are really, really painful for the fish and unfortunately the methods that they use to eradicate the sea lice infestations are equally as painful for the fish. So high pressure, high temperature kind of delousing techniques can be incredibly stressful and unfortunately these types of infestations are really common in net pen aquaculture.

**Mariann:** Is this a type of aquaculture that's taking over? Is it becoming more common? I recently interviewed somebody, and it was specifically about salmon, and it was in the Pacific Northwest. Which sounds kind of fancy, that's where salmon are supposed to come from, but it sounded like the exact same conditions. Is this the way that most salmon is raised now? Raised...I don't know whether that's the right word. They're not really raised...kept these days.

**Brooke:** So I think it's an increasingly common usage. We do see some like inland type tank facilities, but really this is simpler for producers in a lot of ways. You know, that the water is already there, they're just kind of building up the net pens themselves. So a lot of the work has been done for them.

**Mariann:** You mentioned, there are two lawsuits here, Dije, and one is in DC. And the other is in federal district court in Illinois, I believe. And I actually wanted to know why it's in Illinois, but let's start with the Illinois case.

And then we'll just follow up with a little bit on the DC case. So it's in federal district court in Illinois, as I said, why is it in Illinois? As far as I can tell, it's a New York case. I mean, it's following New York law.

**Dije:** Yes. That's one of the kind of mysterious things about class action cases.

It was filed in the Illinois district because that is where Aldi is headquartered. And so with class actions, you can bring...you know, the plaintiffs may be from a different state than what the case is filed in.

**Mariann:** There's a lot of causes of action here, but there's only two that are really at play, at least at the moment this motion was decided, which we're gonna be talking about. And they're both under New York law. And can you just kind of summarize for us what New York... I think there are two statutes that really relate to false advertising, or deceptive practices, they're kind of similar. Can you just tell us what these laws require?

**Dije:** Yeah, they actually are quite similar. But basically, one is specific to false advertising, one section, and one is more a general deceptive trade practice that encompasses the other, but they are separate causes of action. And in both situations, for both code sections to survive, the plaintiff basically have to plausibly claim that they were misled by something that the business did. In this case the advertising is the claim at issue.

**Mariann:** All right. So there's a motion to dismiss and let's go through some of these issues that came up because they brought up a lot of the issues that are relevant here. I think the first argument, correct me if I have this wrong, is that the plaintiff failed to state a claim that the advertising was misleading because of this BAP certification.

It claims to be sustainable, but it's in the context of the BAP certification. Is that right? And are they legitimately arguing that you can't even state a claim that this is not sustainable just because they have something that says BAP on their package? All right, I'm gonna stop ranting about it and let you explain it.

**Dije:** Well, yeah, you're correct. And that's basically the main argument is that they're basically saying "as a matter of law, this label is not misleading because there's this BAP logo and that tells the consumer what sustainable means.

So to get further into the argument, the plaintiff's complaint alleges that when a consumer sees "sustainable" on a fish label, they think that means the animals are treated better, they're raised with higher animal welfare standards, that there are higher environmental standards involved and there's actually consumer surveys out that basically support this notion.

What Aldi is arguing here is that, "Oh no, our definition of sustainable is basically just that the species is allowed to continue to propagate. Consumers couldn't possibly be misled that it indicates a higher standard. And also, even if it did indicate a higher standard, we have this logo here, so they can Google BAP apparently and figure out what that means. And therefore no reasonable consumer could possibly be misled by this label."

That's the gist of their argument. And fortunately the court found that not to be the case. The court basically said, "we're not sure consumers even know what BAP stands for or whether it's legitimate or not. And this is a motion to dismiss, so we have to take all facts in the complaint and view them in the light, most favorable to the plaintiff. And the plaintiff has indeed, you know, plausibly pled that they were misled."

**Mariann:** So it really seems like a nonsensical argument and you've made this clear, but I just wanna make it crystal clear. It just says BAP. It doesn't say BAP and then list all of the standards that they use or anything. It says BAP, how would anybody know what the hell that's supposed to mean?

And it's not even, as you point out, or I think the court pointed out, it's not even right next to, like, on top of the sustainability claim. It's kind of in a somewhat different place on the label. I mean, a label is small amount of real estate, so it's not that far away, but you would never know that they were related in any way.

But they do make other arguments. And the second argument has to do, I think, with some of the publications that you cited, the ones that you were just talking about, which kind of explain what consumers consider sustainable to mean. What is their problem with you offering evidence as to that really relevant fact?

**Dije:** Yeah. So I think they were basically trying to say, "well, there's no survey on this exact phrase so those surveys don't support that the plaintiff was misled." Because there's no actual survey that exactly asks, "What do you think simple, sustainable seafood means?" And the court actually said at this point, this isn't even the right point to get into that.

All that needs to happen in a complaint is a simple, plain statement that puts a defendant on notice of what they're facing in this lawsuit. The citations to those studies were in support of that, but this is not the appropriate time to get into whether the studies, the consumer surveys are appropriate or not.

So the court basically kind of put that off for later, but our view is that the consumer surveys are relevant. They do talk about fish sustainability and it shouldn't be so narrow that only an exact survey on this exact product with this exact term is relevant, so.

**Mariann:** Yeah, these aren't really unusual. I mean, what sustainable means, it's not an unusual term. This is a bit of an aside at the moment... Maybe I shouldn't say this, but I'm actually a little surprised at how strongly people do believe that the term sustainable refers to animal welfare, particularly in the fish context.

Can you talk a little bit about these studies? Because I was very pleasantly surprised to hear that that, that you do have that evidence.

**Brooke:** Yeah, I think it's really fascinating to see that people view sustainability, like the plaintiffs allege in their complaint, in really broad and pretty varied amount of ways. But some studies that are referenced in the complaints specifically say that, when consumers are looking at terms like sustainability, one of the things that they consider is actually fish welfare, is that the products are sourced in accordance with higher environmental and animal welfare standards. A lot of this information is referenced in the complaint because it provides support for the plausible allegations therein.

**Mariann:** My guess...this is just me guessing...is most people might interpret it more broadly than the way Aldi wants to interpret it, just like you're not driving them into extinction, to include environmental issues, like the pollution that you mentioned. I'm really glad, you know, and when I started thinking about it it occurred to me that-people are so eager to think that the food they're buying and the food that they want is benign that they will attach a lot of meaning to any statement that a company makes about it.

And finally, there's a way to make that naivete work against the company that is deceiving these consumers, rather in favor of the company that is using these terms hoping the consumers will think they mean a lot more than they say they mean.

Alright, so there's also a puffery claim. I thought this was particularly ridiculous. But can you explain, just for those who don't do this kind of law, what puffery is? (Because it's one of the best terms in law, it's so much fun to say!) What it means and what their claim is here that there was puffery.

**Brooke:** So puffery essentially is a non-actionable kind of claim. It's either so broad, so ambiguous, so up in the air that it's not challenged or can't be challenged under the law. And Aldi essentially made that argument here, that their "simple, sustainable seafood" promise was puffery because it's not really tied to a specific commitment, a specific idea of sustainability. It's just too broad, generally, to be actionable.

**Mariann:** Yeah. So puffery would be like "the best coffee in the world." Something that you would assume they're exaggerating.

How they, with a straight face, argue that the term sustainable means nothing. Like, how do they do this? I don't know. They're arguing what it means and then



they're arguing that nobody thinks it means anything. Then why would they use up their very valuable real estate on that package to put it on there? And actually the other argument that I got from the court's decision is that she wasn't injured, this particular plaintiff.

And at the moment, I should make clear, that at the moment, though you've talked about this as a class action, at the moment, I think, it's still just a claim by one person hoping to become a class action. Is that a legitimate way to put this?

**Dije:** Yes and the phrase is putative class action.

**Mariann:** Ah, okay. And finally there was the question of injury.

What kind of injury does she have to have alleged that she suffered? I mean she paid for salmon, she bought salmon, she got salmon. So what is the injury that she is asserting that she suffered? I think most of us can imagine that, but let's just lay it out.

**Brooke:** So I think plaintiff Rossen here is not saying that she bought salmon, she received salmon. She's saying she bought salmon with the sustainability representations on the package and that what she received was salmon that didn't comport with those sustainability representations. So that's really where the injury lies. It's a matter of the fact that the representations were on the product package and that whether the salmon was edible, or whatever was included in some of the briefing, she didn't receive the salmon that she expected to purchase that complied with these provisions or representation.

**Mariann:** And I know obviously the goal is to bring a class action, but assuming that she just brought this case all by herself, what would be her damages?

**Dije:** So that's actually kind of a complicated calculation. An analysis that we hire experts for, that will do an analysis that basically looks at-how much was this representation worth to the consumer when they purchased the product? And they'll, I'm not an expert in this, but they will plug this into a complicated equation and come out with a price differential. Okay. You know, the typical price of salmon is this and this representation was worth X to the consumer. And that's kind of how damages are calculated.

**Mariann:** And are there attorneys fees in these cases?

**Dije:** Yes. In a class action case that is something that's recoverable either in a settlement or if we go all the way to trial and get a judgment.

**Mariann:** Yeah. And I want to talk a little bit more about how the court dealt with the parts of her pleading that referred to the class action. But before that, I just wanna check, because there's also a breach of warranty claim. And my understanding is that the issues are not significantly different from the consumer deception claim but if I'm wrong, can you correct me?

**Brooke:** Yeah, no, you're correct. They're pretty substantively similar on those points.

**Mariann:** Okay. So let's talk about the fact that she also also pled violations of consumer protection laws in, I think 33 other states, even though she didn't buy salmon in any of those states. So how does this work?

And, of course, as you point out that's because you hope to have a lot more plaintiffs. How does it work when you bring in class action? You called it a putative class action. At what point does it become a class action so that these other statutes will actually be relevant? Which they're not at the moment.

**Dije:** Yeah. So generally, as a case proceeds after some discovery to find out where the products were sold, how much were sold, which states, et cetera, plaintiff will make a motion for class certification. And that's where hopefully the judge will decide that this plaintiff is a suitable representative, that council representative and that this case is suitable for class action treatment. Meaning, the consumers, even though they're in different states operating under different statutes, their claims and the injuries that they've suffered are similar enough to be treated as a class action.

And it's much more efficient of course. As you mentioned, calculating damages, you know, one plaintiff buying one package of salmon, that's gonna be a few cents, right? Is it worth it to bring a case? But if you have millions of consumers around the country buying millions of packages of salmon that have been misled by these representations, then it makes more sense. It's a more viable lawsuit and it's gonna get some traction and hopefully cause some change.

**Mariann:** Now, I didn't really understand why, since this is exactly how you're litigating it and this is a putative class action, why there was any question. And the court did go into quite a bit of discussion of this, whether it's a standing issue, or a class certification issue, whether these causes of action based on currently not relevant statutes, but hope to be relevant statutes, should be



dismissed at this point. Can you just elaborate on that a bit? What are some of the questions that arise in the way you plead a case like this? And whether the court will allow these causes of action to stand, which the court did hear.

**Dije:** Right. Sure.

Unfortunately, there seems to be a trend in some circuits in the country where the court basically is saying for these federal class actions that you literally have to have a plaintiff from every state on the pleadings. So there have been some situations where the multi-state class has been dismissed.

So that I think was what Aldi was trying to do here and fortunately the court said, “no, at least for now, our circuit doesn't operate that way and we're gonna let this proceed for now.”

It just seems to be continuing the trend of courts somewhat disfavoring class actions and finding new and different ways to shut them down. So that unfortunately seems to be a trend.

**Mariann:** So you would have to do all of that legwork of finding all of those plaintiffs before you even file a case. Now I get it. I also pulled out this quote, which seemed kind of troubling. I think is on a somewhat different issue, “The court recognizes that asserting a class action under consumer protection statutes of multiple states may not be manageable.”

Why would that not be manageable? Isn't that relatively common in class actions, that there are different statutes from different states.

**Brooke:** So that's definitely true. Consumer protection statutes do vary from jurisdiction to jurisdiction, but when the court's considering whether or not it's unmanageable, and I think you see this in our pleading, that we reference 33 states, they're really looking at the similarities between the consumer protection statutes.

So a case that would be unmanageable would be a case where the 40 consumer protection statutes vary too significantly between each other. So the causes of action are just so separate that litigating all of those on a single class basis would be very difficult for the court to do. And I think you could see this in our pleading.

This is why the jurisdictions listed have really substantially similar consumer protection statutes, similar requirements, similar causes of action.

**Mariann:** I see, that's why it's not all 50. Because every state has a consumer protection statute, right?

**Dije:** I believe all states do. And I'm not sure if the fact that it wasn't 50 states was because Aldi is not in all 50 states, I'm not certain about that, but maybe it's a combination of the two things.

**Mariann:** All right. So, as either you or I said, you did survive this for the moment and the court is allowing this to proceed and let you go forward turning this into a class action and finding those plaintiffs. How do you find those plaintiffs?

**Dije:** Once a class is certified notices will go out in different, you know, there might be a print notice in magazines. There may be websites, commercials. "Have you purchased this product? You may have been injured and go to this website to file a claim," that type of thing. So that's how the other plaintiffs from the other states will be notified and found.

**Mariann:** It sounds like a big job, but it sounds very exciting. All right, finally, and you had mentioned this before, there was also an injunction sought in this case and this was the one piece of the case that was not, at least at the moment, successful.

And can you just explain the court's thinking of why she wasn't entitled to an injunction of having survived this motion?

**Dije:** Yes. So this is in another unfortunate trend in class action cases. So basically what the courts are saying is that...injunctive relief would be basically causing the company to stop what they're doing. Stop using this label, stop falsely advertising.

And the court is saying, "well, you plaintiff, you already know that this label is misleading. So you don't have a threat of future harm because you, Rossen, know that when you go into the grocery store and you see this product with this label, you're not gonna be misled because now you know what the true practices are with these salmon. So therefore, because there's no threat of future injury, you are not entitled to injunctive relief." And that is a trend, unfortunately, in class action cases. And so the court actually did dismiss that part of the complaint. So going forward, that's not a possibility any further in this class action case.

So it's kind of a catch 22, you can never get injunctive relief, basically, if you're a class action plaintiff.

**Mariann:** Right. Well, you could win, but then you probably wouldn't need injunctive relief, right? Presumably if you win, they will fix their label.

**Dije:** One would hope.

**Mariann:** We will assume. \*laughs\*

I think that's everything, unless there's anything else you wanna mention about the Illinois case. But as we mentioned, there's also a DC case, which is on very similar facts. It's also based on this label, I think you mentioned it's also based on the similar allegations in the website. You mentioned the plaintiff, but can you repeat that for us? Who's that plaintiff in that DC case?

**Dije:** Yes. The plaintiff is called Toxin Free USA. They are a nonprofit group that is dedicated to a number of causes, basically involving truthful labeling of food, so this is right up their alley. The reason why there's a separate case actually kind of is connected to our last discussion about the injunctive relief.

Increasingly in these class action cases, we plead injunctive relief, but it's denied because of the reason I explained earlier. In this case, this is in the District of Columbia Superior Court. There is a fairly strong consumer statute and it allows for nonprofits like, we call them TFUSA for short, and they are able to get injunctive relief.

So that's basically another avenue. So it's why there's kind of companion cases because we can get, we know we're gonna get injunctive relief in DC court. If we prevail.

**Mariann:** What would be the jurisdiction of that injunctive relief? Would they need to stop using this label all over the country?

**Dije:** Yeah, that's a good question.

No, but in reality, probably they will, right? I used to be a prosecutor in California and we would get kind of the same issue where, "Oh, we're gonna have to change all of our products now just for California." Yes! And that's a good thing because in reality it'll be difficult to have, "oh, we're just gonna sell this one certain set of products in DC and everywhere else we're gonna keep the labels."

Again, and that kind of reciprocal, that's a good reason why we have a class action in addition, just in case. So we cover the national front, we cover DC, we get injunctive relief and hopefully practice changes in the long run.

**Mariann:** I see because I was mystified as to why there were these two cases. Though I was thinking it might be that the law...I mean, I know that the law in DC is extremely favorable, the most favorable for consumer protection.

Aside from the relief that can be granted, does the statute significantly vary? I just wanna mention to listeners that we've talked about this statute in more detail before on other cases so there's definitely a lot to learn here.

But getting back to my question-how does the statute differ in significant ways?

**Brooke:** The CPPA is a really friendly consumer protection statute in that it does apply a lot of broad relief. Injunctive relief is the first thing that we mentioned, but also you don't have to prove under the statute that a consumer was actually deceived or misled.

So that's something that's pretty different from other consumer protection statutes and unique to DC.

**Dije:** Yeah. So another kind of important difference that the DC statute has is that nonprofits are basically, almost automatically, granted standing and standing is a big issue.

Many consumer statutes throughout the country don't allow a nonprofit to file a case. In California, actually, they can, but unfortunately under California's unfair competition law, something called prop 64 in 2004 made it really hard for nonprofits to get standing as opposed to law enforcement prosecutors.

We have a great statute in California that also does not require that a consumer actually be misled, but it's really hard for nonprofits to prove standing. DC basically says, if you're a nonprofit and you're representing the general public, you have standing to bring a case and you don't have to prove injury, economic injury, that type of thing.

So that's another great reason why DC is a good venue for a nonprofit to bring a case.

**Mariann:** I know that the class action is crucial to really making the point. But if you were just to be successful in DC, that would actually go a long way to

making them stop using the label it's just that you don't get any damages, is that right?

**Dije:** Yes, the complaint does not ask for damages. It basically asks for practice changes, for injunctive relief. And of course attorney's fees along with that, but yes, no damages.

**Mariann:** All right. So what are the next steps in each of these cases? I think these decisions are relatively recent.

**Dije:** Right. The DC case, the motion to dismiss was denied in February and in the Illinois class action case that was denied in May. And so both cases the defendant Aldi has filed their answer and discovery is underway in both cases. So the next step, okay we're gonna go through discovery, but it's possible that Aldi may try to file a motion for summary judgment, we don't know. And somewhere along the line, in the class action case at least, we'll be filing a motion for class certification.

**Mariann:** As a more general matter, what are the benefits and challenges of using consumer protection laws to make changes to animal agriculture? To just help animals in general? Why is this an area that you think has legs?

**Dije:** Companies know that consumers increasingly care about animal treatment, animal welfare, and they also know that consumers are increasingly eco-conscious.

So, they're basically increasing the amount of humane washing and green washing they use. And so that's bad. We think these kind of cases are important because number one, they actually do protect consumers, right? Consumers are being misled and they are generally shelling out more money for things that they think are better for the environment, better for animals, that type of thing.

And also we think these cases are important because we think it's important to stop this humane washing and greenwashing because the true way that animals are treated should be known. If companies are able to keep selling their animal products, their meat products, their fish products, their dairy products, their egg products, and get away with it because consumers, like you mentioned earlier, they wanna feel good about what they're buying.

They wanna feel good about what they're eating, and we wanna stop that. We wanna stop the...if consumers wanna keep buying these things, they should at least know the truth about what's happening. And using consumer protection

statues and false advertising sometimes, but not always, they can get around issues of preemption and things like that. So that's another good reason to use them.

**Mariann:** Yeah, no, I've always been a big fan and I'm really excited to see how much is happening. And I'm very thankful to the District of Columbia for passing that great statute, but I'm super excited about the fact that we're starting to see more arguments for class actions in this area. Because I think class actions really scare companies who are doing bad things. So I'm all for it!

Before I let you go, I'm just curious why fish? I mean, particularly when your passion is animal welfare, it seems more challenging to get people to care about the welfare of fish. Am I wrong?

**Brooke:** I think that's definitely true, but I think just because something is challenging doesn't mean we should shy away from it, fish in particular.

I mean, the number of animals involved here is just staggering and we're hearing a lot of industry lines-directed primarily to the public who, as Dije mentioned, is increasingly conscious and aware of what they're eating and what they're putting into their family's bodies-that "fish are the greener, healthier, alternative protein source where fish fish facilities are not like these CAFOs that you've been seeing. They're different, they're better."

And so I think targeting fish in that way is really important because it's a matter of raising public consciousness. I think also the science has just been really proliferating recently in terms of who fish are as individuals, what they're capable of, what their lives are like. And so I think as a lot of that kind of information comes out, people are becoming increasingly willing to listen about fish welfare issues. So in a sense, it's the perfect time to take a stance on these kind of things.

**Mariann:** Yeah. And I mean, the environmental issues are so, well of course they are for land-based factory farming as well, but it's always good to have that double punch when you're arguing animal welfare, that it's also really horrible for the environment.

And certainly you have a case here that seems to exactly fit that. Why Aldi of all places? I don't even go to Aldi, I've never been near an Aldi so I don't know a lot about them. So why are you picking on them?



**Brooke:** Part of what we do-we're really worried about these conscious consumers who care about the food and the products that they're purchasing and Aldi's created a bit of a market for feeding your family, but in a healthful, seasonal way. They'll do rotations of products, things like that, but they're targeted toward a much lower price point.

They're making this food kind of more accessible to everyone. And I think when we're thinking in terms of consumer deception, the exact type of people that we want to protect are the people who are really looking for ways to adequately and kindly feed their bodies and their family's bodies, but in a way that's affordable.

And so I think that was a pretty big issue in this case.

**Mariann:** Yeah. That makes total sense because I mean, when I was a kid salmon was a luxury food. I mean, nobody ate salmon, now it's just everywhere. I mean, it's what happens when they figure out how to factory farm anything, all of a sudden it's everywhere. But people probably still have that idea of it as a premium food.

And it is tragic that people are being deceived in this way. So thanks for sharing all of this. We'll be looking forward to hearing what happens. You still have a long way to go on this case, but I'm excited about it and thanks for sharing it with us today.

**Dije:** It was great to talk to you. Thank you for having us.

**Brooke:** Yeah, thanks so much.