IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

William Carter,	)	
Plaintiff,	)	
	)	No. 17-cv-7241
-vs-	)	
	)	*(Judge Maldonado)*
City of Chicago, et al.,	)	
	)	
Defendants.	)	

PLAINTIFF'S RESPONSE IN OPPOSITION TO DEFENDANT MOHAMMED'S MOTION TO AMEND ANSWER

Throughout the six years of this litigation, defendant Kallatt Mohammed has invoked the Fifth Amendment, refusing to answer questions about plaintiff William Carter's allegations that Mohammed and other officers framed Carter for three separate drug offenses. Now, six months after the close of fact discovery, Mohammed seeks to withdraw his assertion of the Fifth Amendment privilege and file an amended answer to the complaint.

The record in this case shows that Mohammed asserted a Fifth Amendment privilege in bad faith and now attempts to gain an unfair advantage by withdrawing the assertion after the close of fact discovery. The Court should not tolerate this attempt to game the system. The Court should deny the motion.

I. Background and Procedural History

Plaintiff William Carter alleges that he was framed for drug possession during three separate arrests by a team of corrupt Chicago police officers led by former Sergeant Ronald Watts. Defendant Mohammed was involved in each arrest.

After Carter filed formal complaints with the Chicago Police Department about the first two arrests, Watts and his corrupt team learned about the complaints. In retaliation, Watts and his team falsely arrested Carter and again framed him for selling drugs. The frame-up was successful: A jury convicted Carter and the court imposed a nine-year sentence.

More than a decade after Carter was convicted of these false charges and after Watts and Mohammed pleaded guilty to federal criminal charges for stealing what they believed were drug proceeds from a government informant, the Circuit Court of Cook County granted the State's motion to vacate Carter's wrongful convictions and granted him certificates of innocence.

Carter filed this lawsuit on October 6, 2017. (Case No. 17-cv-7241, ECF No. 1.) This is the fourth lawsuit filed against Watts and members of his tactical team. There are now more than 175 cases pending against Watts and officers who worked for him. The cases are all part of the Watts Coordinated Pretrial Proceedings, 19-cv-1717, which have been coordinated for

pretrial discovery. The core allegation of each case is that the officer defendants framed the plaintiffs for drug offenses, causing each plaintiff to be wrongfully convicted.

Defendant Mohammed filed his answer to Carter's complaint on May 11, 2018. (Exhibit 1, Case No. 17-cv-7241, ECF No. 71.) Mohammed refused to answer 42 paragraphs of the complaint, asserting a Fifth Amendment privilege.[1]

Mohammed was deposed about Carter's allegations and those of six other plaintiffs on November 21, 2019, and he asserted the Fifth Amendment privilege in response to nearly every question he was asked. Plaintiff attaches Mohammed's deposition as Exhibit 2; questioning about Carter's allegations appears on pages 223-271. Mohammed invoked the Fifth Amendment in response to 426 questions. The page and line numbers of each invocation are collected in an addendum to this memorandum.

On January 20, 2023, the parties to the Watts Coordinated Proceedings agreed to stay discovery in all but 19 "test cases" to help the parties assess the value and merit of the remaining cases. (Case No. 19-cv-1717, ECF No. 393.) This is one of the test cases. On March 5, 2024, this Court

[1] Paragraphs 2, 5, 6, 17, 18, 19, 20, 21, 22, 23, 25, 27, 28, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 48, 55, 56, 57, 58, 59, 60, 62, 63, 64, 65, 66, 67, 68, 69, 74, 85, 111, 112.

scheduled this case for trial beginning on May 27, 2025. (Case No. 17-cv-7241, ECF No. 158.)

The discovery cutoff for the test cases was December 18, 2023. (Case No. 19-cv-1717, ECF No. 419.) Magistrate Judge Finnegan, who is managing discovery in the coordinated proceedings, reaffirmed the discovery cutoff on January 13, 2024 when she denied defendants' request for an across-the-board six-month extension.[2]

Five months after the close of fact discovery, defendant Mohammed filed his present motion for leave to file an amended answer and withdraw his invocation of the Fifth Amendment privilege.[3] (Case No. 17-cv-7241, ECF No. 162.)

Mohammed rests his motion on the assertion that "fact discovery for this matter is still open."[4] (Case No. 17-cv-7241, ECF No. 162 ¶ 4.) This assertion is incorrect.

[2] The Magistrate Judge allowed an extension of time to complete specific discovery. (Case No. 19-cv-1717, ECF No. 658.) None of these exceptions applies to Mohammed's request to withdraw his assertion of privilege and file an amended answer.

[3] Mohammed initially filed his motion before Judge Valderrama, who is presiding over the consolidated *Watts* proceedings. (Case No. 17-cv-1717, ECF No. 736.) Mohammed refiled the motion before this Court in compliance with Judge Valderrama's order of May 31, 2023. (Case No. 17-cv-1717, ECF No. 743.)

[4] Mohammed omits this incorrect assertion in the similar motion he filed in *White v. Chicago*, Case No. 17-2877, ECF No. 176.)

The orders setting and maintaining the December 18, 2023 discovery cutoff date, discussed above, are clear and unambiguous. Moreover, defendant Mohammed consented to the filing of a Joint Status Report in this case on April 4, 2024, which acknowledged as much. The Joint Status report states, "Fact discovery in the test cases, including this one, is closed other than certain depositions that Magistrate Judge Finnegan has allowed to continue past the discovery cutoff." (Case No. 17-cv-7241, ECF No. 160 at 1.) All defense counsel, including Mohammed's attorney, reviewed, approved, and authorized the filing of the Joint Status Report. (Case No. 17-cv-7241, ECF No. 160 at 3-4.)

Mohammed asserts in conclusory fashion that he is seeking to withdraw his Fifth Amendment privilege because "[s]ubsequent investigation of Plaintiff's allegations revealed information that resulted in the undersigned counsel's determination that the privilege could, and should, be withdrawn." (Case No. 17-cv-7241, ECF No. 162 ¶ 3.) Mohammed does not provide any details of the "subsequent investigation." Nor does Mohammed describe the newly revealed "information." Plaintiff explains below that, as in *Martin-Trigona v. Gouletas*, 634 F.2d 354 (7th Cir. 1980), "[t]here is ample reason to believe that [Mohammed's] claimed fear of self-incrimination is fanciful." *Id.* at 362.

Mohammed attached his proposed amended answer to his motion. (Case No. 17-cv-7241, ECF No. 162-1.) The proposed amended pleading replaces invocations of the Fifth Amendment with responses that neither admit nor deny because Mohammed "lacks sufficient knowledge upon which to form a belief as to the truth of the allegations contained in this paragraph." The allegations of which Mohammed claims to lack "sufficient knowledge" involve matters in which Mohammed was personally involved.

For example, plaintiff alleges in paragraph 55 that,

> 55. Defendant Jones placed plaintiff in handcuffs and walked him into the hallway where defendant Mohammed joined them.

Mohammed previously asserted a Fifth Amendment privilege to this allegation. (Exhibit 1 ¶ 55.) Mohammed now seeks to amend his answer to state that he "lacks sufficient knowledge" of whether he joined Jones and plaintiff in the hallway. (Case No. 17-cv-7241, ECF No. 162-1 ¶ 55.)

Mohammed seeks leave to file the same evasive response to the allegations of paragraphs 57 and 58 of the complaint, which describe Mohammed's involvement in specific events:

> 57. Defendant Mohammed knew that Defendant Jones did not have any lawful basis to handcuff plaintiff and could have, but did not, intervene to prevent the violation of plaintiff's rights.
>
> 58. Jones and Mohammed then walked plaintiff down the stairs to the first floor of 527 East Browning.

(Case No. 17-cv-7241, ECF No. 1 ¶¶ 57, 58.)

These proposed responses suggest that the newly revealed information is that Mohammed does not remember the events in question. The Court should reject this implausible argument and deny Mohammed's motion.

II. The Court Should Deny the Motion to Amend Because of Mohammed's Bad Faith

The record shows that Mohammed asserted the Fifth Amendment privilege in bad faith. His request to withdraw the assertion after the close of fact discovery is an attempt to gain an unfair advantage. The Court should not tolerate Mohammed's attempt to game the system by withdrawing the privilege now after he used it "to avoid discovery altogether." *Harris v. City of Chicago*, 266 F.3d 750 (7th Cir. 2001).

Denying Mohammed's motion is consistent with *Harris* and decisions in other circuits upholding the refusal to permit a party to withdraw the privilege after asserting it during discovery.[5]

The police officer defendant in *Harris* asserted the privilege to avoid discovery and then withdrew the privilege at trial. *Harris*, 266 F.3d at 753. The district court allowed the defendant to testify and excluded evidence of

[5] *See, e.g., Davis-Lynch, Inc. v. Moreno*, 667 F.3d 539, 548 (5th Cir. 2012); *United States v. Certain Real Prop. & Premises Known as 4003-4005 5th Ave.*, 55 F.3d 78, 84 (2d Cir. 1995); *Edmond v. Consumer Prot. Div.*, 934 F.2d 1304, 1308-09 (4th Cir. 1991); *Gutierrez–Rodriguez v. Cartagena*, 882 F.2d 553, 576 (1st Cir. 1989).

his prior silence. *Id.* The Seventh Circuit reversed, holding that it was an abuse of discretion for the district court to exclude evidence of the previous invocation of the Fifth Amendment. *Id.* at 755. The Seventh Circuit explained its decision by quoting *McGahee v. Massey*, 667 F.2d 1357, 1362 (11th Cir. 1982): "A defendant cannot have it both ways … [He may not] testify in attack ... and at the same time seek refuge behind the shield of the Fifth Amendment.'" *Harris*, 266 F.3d. at 754.

Mohammed mistakenly seeks to rely (Case No. 17-cv-7241, ECF No. 162 ¶ 8) on the Seventh Circuit's subsequent decision in *Evans v. City of Chicago*, 513 F.3d 735 (7th Cir. 2008). There, the district court allowed defendant police officers to withdraw their assertions of the privilege and excluded evidence of the prior assertions at trial. *Id.* at 740. The Seventh Circuit affirmed after finding "a good-faith invocation of the Fifth Amendment" because a special prosecutor had been investigating the officers' conduct until shortly before trial. *Id.* at 743.

Mohammed is unable to point to anything showing that he acted in good faith in asserting the privilege. Nor has Mohammed identified any factual development that supports his current attempt to withdraw the privilege. His only explanation is the claim that "[s]ubsequent investigation of Plaintiff's allegations revealed information that resulted in the undersigned

counsel's determination that the privilege could, and should, be withdrawn." (Case No. 17-cv-7241, ECF No. 162 ¶ 3.) Mohammed does not explain what the newly revealed information is, when he learned that information, or why he did not learn about it earlier.

Like the officer in *Harris*, Mohammed did not seek to withdraw his assertion of the privilege before the close of fact discovery. *Harris v. City of Chicago*, 266 F.3d 750, 753 (7th Cir. 2001). And unlike the officers in *Evans*, Mohammed is unable to show a legitimate basis for asserting the privilege and now seeking to waive any privilege. *Evans v. City of Chicago*, 513 F.3d 735, 743 (7th Cir. 2008).

Mohammed is also comparable to the officer in *Harris* because he "invoked the Fifth Amendment in response to several general questions which could not possibly have incriminated him." *Harris*, 266 F.3d at 754. For example, Mohammed asserted a Fifth Amendment privilege when asked if signatures that appeared on police reports prepared more than 10 years before were his signature. (Exhibit 2, Mohammed Deposition, November 21, 2019, 224:10-225:6, 235:18-20, 253:20-21.) The Supreme Court long ago rejected this theory in *Gilbert v. California*, 388 U.S. 263, 266 (1967) (taking of writing exemplars did not violate Fifth Amendment privilege).

The Second Circuit, in a case cited by Mohammed (Case No. 17-cv-7241, ECF No. 162 ¶ 9), explained why the tactic Mohammed attempts is improper:

> Since an assertion of the Fifth Amendment is an effective way to hinder discovery and provides a convenient method for obstructing a proceeding, trial courts must be especially alert to the danger that the litigant might have invoked the privilege primarily to abuse, manipulate or gain an unfair strategic advantage over opposing parties.

United States v. Certain Real Prop. & Premises Known as 4003-4005 5th Ave., 55 F.3d 78, 84 (2d Cir. 1995). There, a defendant asserted the privilege to avoid discovery and then sought to withdraw the privilege in response to a motion for summary judgment. The Second Circuit affirmed the district court's ruling barring the party from introducing any material that the defendant had previously claimed to be privileged. *Id.* at 85.

Mohammed is unable to show that he "was not using the privilege in a tactical, abusive manner." *Davis-Lynch, Inc. v. Moreno*, 667 F.3d 539, 548 (5th Cir. 2012). For example, Mohammed refused to answer questions at his deposition of whether a prosecutor had asked him questions when he gave grand jury testimony:

> Q. When you testified to the grand jury, did a prosecutor ask you questions?
>
> A. Take the Fifth.

(Exhibit 2, Mohammed Deposition, November 21, 2019, 235:3-5.) Likewise, Mohammed refused to answer what his assignment was on the date of one of plaintiff's arrests:

> Q. On March 3rd, 2004, were you assigned to the tactical team second watch in civilian dress?
>
> A. Take the Fifth.

(Exhibit 2, Mohammed Deposition, November 21, 2019, 239:3-5.)

By invoking the Fifth Amendment privilege, Mohammed was asserting that he had a good faith belief that truthful answers would incriminate him, the standard for proper invocation of the Fifth Amendment. *Ruiz-Cortez v. City of Chicago*, 931 F.3d 592, 603 (7th Cir. 2019). Mohammed's present motion shows that this was not true.

It is impossible to conceive how a "subsequent investigation" could show that Mohammed had a good faith basis for asserting the privilege and now withdrawing it in response to questions like, "Is that your signature?" or "Did a prosecutor ask you questions before the grand jury?" The same is true for questions to which Mohammed now seeks to assert an inability to recall. He fails to explain how testifying about an inability to recall could incriminate him.

Mohammed's vague and unsupported assertion of an investigation and newly revealed information does not satisfy the standard applied by the

Seventh Circuit in *Evans*, where the Court of Appeals expressly found that the defendant officers acted in good faith by showing a legitimate reason for asserting and then withdrawing the Fifth Amendment privilege. *Evans v. City of Chicago*, 513 F.3d 735, 746 (7th Cir. 2008).

The Court should deny the motion because Mohammed has acted in bad faith.

III. Mohammed's Undue Delay Prejudices Plaintiff

There is no merit in Mohammed's claim that plaintiff "will not be prejudiced" if, after six years of litigation, and seven months after the close of discovery, Mohammed is permitted to withdraw his invocation of the Fifth Amendment and file an amended answer. (Case No. 17-cv-7241, ECF No. 162 ¶¶ 6-8.)

Mohammed is incorrect in blithely asserting that plaintiff would not be prejudiced because Mohammed will graciously "afford the opportunity for Plaintiff to question Mohammed on the changes to be made in [the] Amended Answer." (Case No. 17-cv-7241, ECF No. 162 ¶ 7.) This cavalier assertion ignores the 426 deposition questions to which Mohammed refused to answer by asserting the Fifth Amendment. See *above* at 3. Plaintiff has made a host of tactical decisions about the preparation of this case based on Mohammed's invocation of the Fifth Amendment. Six years of litigation

strategy cannot be undone by questioning Mohammed "on the changes to be made in [the] amended answer."

Finally, Mohammed is unable to explain his delay in concluding, at this late date, "that the privilege could, and should, be withdrawn." (Case No. 17-cv-7241, ECF No. 162 ¶ 3.) Just as Mohammed fails to show a legitimate basis for his request for a do-over, he also fails to show any basis for the timing of the request.

Defendant Mohammed was deposed about Carter's allegations on November 21, 2019. (Exhibit 2, Mohammed Deposition, November 21, 2019.) Carter was deposed on August 23, 2022. Documents relevant to plaintiff's allegations were produced in advance of plaintiff's deposition, and no new information has come to light since then. This is not a case where "discovery in a complex case turns up evidence to support a new theory for relief or defense." *Saint Anthony Hosp. v. Whitehorn*, No. 21-2325, 100 F.4th 767, 2024 WL 1792083, at *20 (7th Cir. Apr. 25, 2024) (reversing district court's denial of leave to amend.) This is a case where a litigant seeks to game the system by a bad faith invocation of a privilege and then waive the privilege after discovery has been completed. The Court should reject this tactic and deny the motion.

IV. Conclusion

The Court should therefore deny defendant's motion for leave to file an amended answer to the complaint.

Respectfully submitted,

/s/ Joel A. Flaxman
Joel A. Flaxman
ARDC No. 6292818
Kenneth N. Flaxman
KENNETH N. FLAXMAN P.C.
200 S Michigan Ave, Ste 201
Chicago, IL 60604
(312) 427-3200
jaf@kenlaw.com
Attorneys for Plaintiff

Assertions of Fifth Amendment by Kallatt Mohammed, November 21, 2019

Number	Page and Line
1	201:21-22
2	201:25-202:1
3	203:7-8
4	204:23-205:4
5	205:5-10
6	205:11-19
7	206:19-206:2
8	206:3-206:11
9	206:12:12-20
10	206:21-207:7
11	207:8-18
12	207:19-208:5
13	208:6-16
14	208:17-209:3
15	209:16-209:24
16	210:1-9
17	210:10-18
18	210:19-211:3
19	211:4-12
20	211:13-21
21	211:22-212:6
22	212:8-212:20
23	212:20-213:7
24	213:8-213:18
25	213:19-214:7
26	214:9-214:25
27	215:2-4
28	215:15-17
29	215:18-216:3
30	216:9-12
31	216:13-23
32	216:14-217:3
33	217:4-14
34	217:15-17
35	217:18-218:4
36	218:5-6
37	218:11-19
38	218:20-219:5

39	219:6-9
40	219:10-13
41	219:14-23
42	219:24-220:4
43	220:4-9
44	220:10-12
45	220:13-17
46	220:17-221:20
47	221:3-15
48	223:14-15
49	223:16-20
50	224:19-21
51	224:22-226:1
52	226:3-11
53	226:13-19
54	226:19-227:3
55	227:4-14
56	227:15-228:1
57	228:2-4
58	228:5-9
59	228:13-16
60	228:17-229:3
61	229:4-6
62	229:7-17
63	229:18-20
64	229:21-24
65	230:1-4
66	230:5-8
67	230:9-19
68	230:20-23
69	230:24-231:8
70	231:9-11
71	231:12-14
72	234:6-8
73	234:6-19
74	234:20-235:2
75	235:2-5
76	235:6-8
77	235:9-10
78	235:18-20
79	235:21-23

Addendum 2

80	235:24-236:20
81	236:14-15
82	236:16 -17
83	236:18-20
84	236:21-23
85	237:3-10
86	239:3-5
87	239:14-15
88	240:1-2
89	240:6-7
90	240:23-241:1
91	241:15-23
92	241:23-242:8
93	242:9-16
94	242:17-243:1
95	243:2-12
96	243:13-23
97	244:11-20
98	244:21-245:6
99	245:7-10
100	245:19-246:5
101	246:6-16
102	246:17-29
103	246:20-23
104	247:12-22
105	247:23-248:3
106	248:3-14
107	248:15-17
108	248:18-21
109	248:22-249:7
110	249:8-11
111	249:12-15
112	249:16-250:20
113	250:21-24
114	251:1-8
115	251:9-11
116	251:17-19
117	251:20-22
118	251:24-252:1
119	252:1-4
120	253:16-18

121	253:20-21
122	254:3-4
123	254:6-9
124	254:20-24
125	254:14-18
126	254:19-21
127	254:22-24
128	255:1-3
129	255:12-14
130	256:8-257:1
131	257:15-23
132	257:24-255:8
133	258:9-21
134	258:22-259:8
135	259:13-23
136	259:24-260:9
137	260:10-19
138	260:12-261:12
139	261:6-8
140	261:9-12
141	261:13-16
142	263:8-11
143	263:12-22
144	263:22-264:2
145	264:3-13
146	264:14-16
147	264:17-265:2
148	265:4-6
149	265:7-9
150	265:10-19
151	265:20-22
152	265:23-266:1
153	266:2-12
154	266:13-15
155	267:19-22
156	267:23-268:2
157	268:3-13
158	268:14-15
159	268:18-21
160	268:22-269:1
161	269:4-12

Addendum 4

162	269:13-21
163	269:22-270:6
164	270:7-15
165	270:16-17
166	270:19-21
167	270:212-24
168	271:1-4
169	271:5-7
170	272:4-5
171	272:6-7
172	272:21-273:6
173	273:7-16
174	273:17-274:1
175	274:2-10
176	274:11-21
177	274:9-11
178	275:12-15
179	275:16-276:1
180	276:18-20
181	276:24-277:2
182	277:7-11
183	277:17-218:2
184	278:3-11
185	278:12-20
186	278:21-279:7
187	279:8-18
188	279:19-21
189	279:22-280:7
190	280:8-18
191	280:12-21
192	280:22-281:2
193	281:12-15
194	281:16-282:1
195	283:22-284:2
196	284:3-6
197	284:7-9
198	284:13-17
199	284:19-22
200	284:23-295:8
201	285:9-11
202	285:12-15

Addendum 5

203	285:16:286:2
204	286:3-5
205	286:6-8
206	286:9-17
207	286:18-20
208	286:21-24
209	287:1-3
210	287:4-6
211	287:7-15
212	287:16-24
213	288:1-9
214	288:10-18
215	288:29-289:3
216	289:4-12
217	289:13-18
218	289:19-22
219	289:23-290:1
220	290:2-4
221	290:5-7
222	290:9-12
223	290:13-16
224	290:17-291:3
225	291:3-14
226	291:15-24
227	292:1-16
228	292:17-294:5
229	294:10-24
230	295:1-7
231	296:1-3
232	296:9-13
233	296:14-297:13
234	297:14-17
235	297:18-20
236	297:24-298:2
237	298:12-15
238	299:8-20
239	300:20-22
240	300:23-301:1
241	301:2-3
242	301:4-6
243	301:7-10

Addendum 6

244	301:11-13
245	301:23-302:1
246	302:2-7
247	302:15-18
248	302:19-22
249	302:23-303:1
250	304:17-19
251	305:12-12
252	305:18-20
253	305:21-24
254	307:16-18
255	307:19-22
256	308:2-11
257	308:12-21
258	308:22-309:6
259	309:7-15
260	309:16-310:2
261	310:3-13
262	311:4-13
263	311:14-23
264	311:24-312:11
265	312:12-22
266	311:23-313:8
267	313:9-18
268	313:19-21
269	313:22-314:1
270	314:2-11
271	314:12-14
272	314:15-24
273	315:1-5
274	315:5-14
275	315:15-17
276	315:18-20
277	315:21-24
278	316:1-4
279	316:5-14
280	316:15-17
281	316:18-317:3
282	317:4-8
283	317:9-16
284	317:17-21

285	317:22-318:4
286	318:5-9
287	318:10-12
288	318:13-15
289	318:16-20
290	319:10-12
291	320:1-10
292	320:11-20
293	320:21-3221:5
294	321:6-14
295	321:15-322:1
296	322:2-15
297	322:16-19
298	323:12-15
299	323:16-24
300	324:2-4
301	324:5-7
302	324:8-16
303	324:17-325:1
304	325:2-4
305	325:5-13
306	325:23-328:2
307	328:2-329:2
308	329:3-4
309	329:12-14
310	329:15-17
311	219:18-24
312	330:1-3
313	330:4-6
314	330:7-9
315	330:15-24
316	331:1-9
317	331:10-12
318	331:13-15
319	332:3-5
320	332:6-8
321	332:9-11
322	332:12-14
323	332:21-333:5
324	333:6-14
325	333:15-334:1

326	334:2-10
327	334:11-19
328	334:20-335:1
329	335:5-12
330	335:13-15
331	335:16-18
332	335:19-22
333	335:23-336:2
334	338:15-24
335	339:1-10
336	339:11-19
337	339:20-340:4
338	340:5-15
339	340:16-341:3
340	341:4-7
341	341:8-17
342	341:18-342:2
343	342:14-23
344	342:24-343:9
345	343:10-18
346	343:19-344:3
347	344:4-15
348	344:16-345:2
349	345:3-6
350	345:7-16
351	345:17-20
352	345:21-346:6
353	346:7-10
354	346:12-24
355	347:1-10
356	347:11-17
357	347:18-348:3
358	348:4-9
359	348:10-21
360	348:22-24
361	349:3-8
362	349:9-14
363	349:15-21
364	349:22-350:4
365	350:5-11
366	351:15-17

367	351:18-21
368	351:22-342:2
369	352:7-16
370	352:17-353.2
371	353:3-11
372	353:12-20
373	353:21-354:7
374	354:8-18
375	354:9-355:3
376	355:4-12
377	355:13-16
378	355:18-356:1
379	356:2-5
380	356:6-15
381	356:16-18
382	356:19-21
383	356:22-357:3
384	357:15-18
385	357:19-21
386	357:22-358:1
387	358:6-9
388	358:10-21
389	358:22-359:7
390	359:8-17
391	359:18-360:3
392	361:15-24
393	362:1-10
394	363:11-19
395	362:20-363:4
396	363:5-15
397	363:16-364:2
398	364:11-14
399	364:15-17
400	364:18-365:2
401	365:3-11
402	366:19-24
403	367:1-10
404	367:11-16
405	370:11-12
406	370:18-371:1
407	371:5-7

408	371:8-10
409	371:11-13
410	371:14-17
411	371:18-21
412	371:22-372:23
413	373:16-18
414	373:19-22
415	272:23-274:11
416	374:17-18
417	375:3-4
418	376:18-20
419	376:23-377:2
420	378:1-2
421	378:3-13
422	378:14-16
423	378:242-379:4
424	379:5-9
425	379:10-13
426	379:14-16