

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

IN THE SUPREME COURT OF THE UNITED STATES

- - - - -

NARKIS ALIZA GOLAN,)

Petitioner,)

v.) No. 20-1034

ISACCO JACKY SAADA,)

Respondent.)

- - - - -

Washington, D.C.

Tuesday, March 22, 2022

The above-entitled matter came on for oral argument before the Supreme Court of the United States at 10:00 a.m.

1 APPEARANCES:

2

3 KAREN R. KING, ESQUIRE, New York, New York; on behalf
4 of the Petitioner.

5 FREDERICK LIU, Assistant to the Solicitor General,
6 Department of Justice, Washington, D.C.; for the
7 United States, as amicus curiae, supporting
8 vacatur.

9 RICHARD MIN, ESQUIRE, New York, New York; on behalf of
10 the Respondent.

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1	C O N T E N T S	
2	ORAL ARGUMENT OF:	PAGE:
3	KAREN R. KING, ESQ.	
4	On behalf of the Petitioner	4
5	ORAL ARGUMENT OF:	
6	FREDERICK LIU, ESQ.	
7	For the United States, as amicus	
8	curiae, supporting vacatur	29
9	ORAL ARGUMENT OF:	
10	RICHARD MIN, ESQ.	
11	On behalf of the Respondent	57
12	REBUTTAL ARGUMENT OF:	
13	KAREN R. KING, ESQ.	
14	On behalf of the Petitioner	80
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

P R O C E E D I N G S

(10:00 a.m.)

CHIEF JUSTICE ROBERTS: Justice Thomas is unable to be present today but will participate in consideration and decision of the case on the basis of the briefs and the transcript of oral arguments.

We'll hear argument this morning in Case 20-1034, Golan versus Saada.

Ms. King.

ORAL ARGUMENT OF KAREN R. KING

ON BEHALF OF THE PETITIONER

MS. KING: Mr. Chief Justice, and may it please the Court:

The Hague Convention provides that a court is not bound to return a child once the grave risk exception is met. The district court here, after finding grave risk to this child, was operating under an incorrect rule of law, that is, the Second Circuit's requirement that courts must examine the full range of potential ameliorative measures and return the child if at all possible.

That requirement should be overturned for four reasons. It's not found in the text of

1 the convention or its implementing legislation.
2 It runs counter to the convention's purposes and
3 framework, which emphasize expeditious
4 proceedings, the safety of the child, and not
5 getting entangled in custody matters. It's
6 contrary to the long-standing views of the State
7 Department. And no other signatory nation has
8 adopted that interpretation of this treaty.

9 If this Court agrees with us, what
10 remains is how best to resolve this case. In
11 our view, a reversal is warranted. It was three
12 years ago today that the district court made its
13 grave risk finding. Safe and swift resolution
14 then would have allowed the child to remain in
15 the U.S. in the interim while the custody
16 proceedings deal with the complex family issues
17 at this -- in this case, including the
18 implications of Mr. Saada's sustained and
19 horrific abuse.

20 But the district court was forced by
21 the Second Circuit to take a lengthy detour,
22 which entangled itself in custody matters,
23 forced the parties to obtain an Italian court
24 order without investigating the effectiveness of
25 that order.

1 That process and the results are
2 inconsistent with the convention, at once, far
3 too long, far too entangled, and at the same
4 time not robust and not protective enough.

5 The child here is almost six years
6 old. He has spent the vast majority of his life
7 in legal limbo. Reversal provides the safe and
8 swift closure he deserves.

9 I welcome the Court's questions.

10 CHIEF JUSTICE ROBERTS: Your position
11 is that the district court should not have been
12 required to consider ameliorative efforts,
13 right?

14 MS. KING: That's correct, Your Honor.

15 CHIEF JUSTICE ROBERTS: But would it
16 be necessarily an abuse of discretion if he
17 chose to do so?

18 MS. KING: It -- it depends on the
19 manner in which that consideration might take
20 place. Our position is that the discretion to
21 consider ameliorative measures is provided by
22 the convention but is also limited by the
23 convention.

24 So, if consideration of ameliorative
25 measures takes too long or entangles the court

1 in custody matters or is -- is somehow
2 inconsistent with the convention on other
3 grounds, that would be an abuse of discretion.

4 CHIEF JUSTICE ROBERTS: Okay. But, if
5 it was something pretty, you know, cut and dried
6 and very simple, I mean, the -- the grave risk
7 is that, you know, his house is next -- next to
8 a nuclear waste dump, and he says, well, I'm --
9 I'm moving in two weeks, you know, here's the
10 agreement. That is an ameliorative condition
11 that the judge can take into account?

12 MS. KING: Well, it -- it depends on
13 the stage of the case. At the grave risk
14 determination phase, the -- the judge can
15 certainly take into account whatever evidence
16 the parties submit to -- to the court.

17 After determining that a grave risk
18 exists and you move to a remedy stage and
19 consider ameliorative measures, in the case
20 where the grave risk is straightforward and
21 simple, easy to identify and easy to resolve,
22 then, certainly, it makes sense that the court
23 does have discretion to consider the easy
24 solutions and to consider return subject to
25 those solutions, but that is in the discretion

1 of the court.

2 JUSTICE KAGAN: The way you just
3 framed the inquiry, Ms. King, is like, well,
4 first, we decide whether there's a grave risk,
5 and then we see whether there's anything that we
6 can do about it.

7 But is it -- is that necessarily the
8 right way to frame the -- the -- the issue? I
9 mean, how do you decide really whether there's a
10 grave risk without thinking about ameliorative
11 measures at -- at that stage? I mean, is this
12 really a two-step inquiry, or should we think
13 about ameliorative measures in order to
14 determine whether there's a grave risk?

15 MS. KING: Well, Justice Kagan, I
16 acknowledge that there is some overlap in the
17 inquiry here because both address risk, but the
18 grave risk analysis is separate from an
19 ameliorative measures analysis because the grave
20 risk analysis, which is provided for by the
21 convention itself, is simply identifying whether
22 or not the circumstances that exist now to which
23 the child would be returned present a grave risk
24 of exposure to psychological or -- or physical
25 harm.

1 Once that is determined, then the
2 district court should have the discretion to
3 decide whether or not it is possible to consider
4 or even preferable to consider ameliorative
5 measures to then address the risk.

6 If you combine the two, you run the
7 risk of making the trial extremely lengthy and
8 wading into issues that a Hague-expedited
9 proceeding should not be wading into. So it
10 should be kept as two separate inquiries.

11 CHIEF JUSTICE ROBERTS: Well, I --

12 JUSTICE BREYER: The --

13 CHIEF JUSTICE ROBERTS: -- just very
14 briefly, it seems to me that if you separate the
15 two inquiries, that's what's going to lengthen
16 the process. If you say the grave risk here is
17 that the -- he's going to live next to a nuclear
18 waste dump and some -- he says I'm leaving,
19 well, that's fine. But, if you have to go
20 through an entirely separate analysis and say
21 don't tell me whether there's ameliorative
22 measures or not, don't tell me if you're going
23 to move or not because that comes later, that
24 seems to be something that's going to delay it.

25 MS. KING: Well, if there's no grave

1 risk at all, then you wouldn't even reach that
2 second stage. And in the vast majority of
3 cases, the parties are not going to be able to
4 satisfy the very high evidentiary burden that
5 ICARA places on parties to satisfy the grave
6 risk exception. It has to prove by clear and
7 convincing evidence.

8 So there's no need to even get into
9 this hypothetical world of what ameliorative
10 measures are -- are necessary. I mean, I -- I
11 acknowledge that there may be some cases where
12 it's so obvious and so discrete and simple that
13 the court may, in the course of -- of having the
14 trial, think about ameliorative measures. And,
15 certainly, the parties can always propose
16 measures and -- and make evidentiary
17 submissions.

18 But I don't think, as a matter of
19 principle and process, it makes sense to combine
20 the two because that would entangle the court in
21 a very lengthy process in every case, which is
22 exactly what we don't want --

23 JUSTICE BREYER: But is there a --

24 MS. KING: -- in an expedited
25 proceeding.

1 JUSTICE BREYER: Look, this is a
2 problem that I had, exactly what's been
3 articulated, and then I began to think -- and
4 tell me if I'm right, because I am a layperson
5 here, you are the expert -- that --
6 "ameliorative measures" wasn't the right words,
7 that what happened was better words were
8 "undertakings." See. The -- the father who was
9 in the foreign country was a risk to the child
10 either because he beat up the wife or maybe he
11 -- he attacked the child. I don't know. And
12 then the judge would say here: Well, give us a
13 promise and maybe backed up by some money or a
14 bond or something.

15 And then "undertakings" didn't seem
16 the right word because undertakings could have
17 included not just "I promise" but also because
18 they get some kind of a foreign lawyer or judge
19 to say "he has to follow these undertakings and
20 we'll watch it." So now it's undertakings plus.

21 And then we get to a new word for it
22 called ameliorative measures. Now, if what I've
23 said is correct, I understand the confusion. I
24 don't know how to write it still, because my
25 first reaction when a layperson reads those

1 words "ameliorative measures" is to say, hey, if
2 there are ameliorative measures, what's the
3 risk? And, if there's not, well, then there's a
4 risk. So, of course, they're going to consider
5 this when they consider whether there's a risk.

6 Now -- now do you see how confused I
7 am?

8 MS. KING: The -- the terminology --

9 JUSTICE BREYER: Now can you
10 straighten me out in a minute or two?

11 MS. KING: -- is certainly confusing
12 in this space.

13 JUSTICE BREYER: But have I got it
14 sort of right or not?

15 MS. KING: Well, different courts use
16 these words interchangeably, which is really the
17 -- the problem in -- in --

18 JUSTICE BREYER: Are we talking
19 basically about undertakings or undertakings
20 plus?

21 MS. KING: Undertakings are promises,
22 I think, of the Petitioner below himself. So he
23 might make promises.

24 JUSTICE BREYER: But undertakings
25 plus, he makes some promises and then we get to

1 try to make them enforceable.

2 MS. KING: Well, yeah, what the Second
3 Circuit then required was trying to overlay on
4 top of that some guarantee of performance. And
5 that's where we ended up on this path of trying
6 --

7 JUSTICE BREYER: Of ameliorative.
8 Okay.

9 MS. KING: -- to figure out something
10 by the court.

11 JUSTICE BREYER: So the answer is,
12 Judge, you're the trial judge. You look in
13 these things when you think they're useful and
14 you don't when you think they're not.

15 MS. KING: We certainly agree that the
16 district court should have had discretion to
17 look at things when it seemed appropriate or
18 perhaps even reject the entire concept because
19 the very act of walking the path of considering
20 hypothetical full range, full panoply of
21 ameliorative measures is -- is simply too
22 burdensome in this --

23 JUSTICE BREYER: No, no, of course
24 not.

25 MS. KING: -- proceeding.

1 JUSTICE BREYER: But, of course, it
2 does make sense if they have an ongoing -- like
3 the EU does it within the EU, you know, because
4 they all know there are courts in the other
5 countries and they have family courts in other
6 countries, and the family courts in other
7 countries, if they are going to deal with it,
8 they can deal with it.

9 MS. KING: Right. Justice Breyer, I
10 think that's -- that's exactly our point here.
11 The United States is only a signatory and has
12 only adopted the 1980 convention. The EU
13 countries are part of Brussels 2A. Other
14 countries have adopted the 1996 convention, and
15 the United States did not ratify that.

16 So we are working only within the
17 framework of the 1980 convention.

18 JUSTICE SOTOMAYOR: Counsel, can --

19 JUSTICE ALITO: I -- I have --

20 JUSTICE SOTOMAYOR: -- can -- I -- I'm
21 sorry.

22 JUSTICE ALITO: Go ahead.

23 JUSTICE SOTOMAYOR: Counsel, I like to
24 go back to the question the Chief started with,
25 what's an abuse of discretion?

1 Assume, as I do, that there are two
2 goals to the convention, not one. It's not just
3 a speedy proceeding. It is an intent to return
4 a child to its habitual residence. That's its
5 number one priority.

6 Its second priority is to protect the
7 child if there's grave danger. But, if the
8 convention insisted that a child shouldn't be
9 returned, it would have said don't return the
10 child if it's a grave danger. But, instead, it
11 gives a district court discretion.

12 So, to me, that means that you have to
13 keep the first goal in mind as well. You can't
14 just eliminate it when you find grave danger.
15 Do you agree with that?

16 MS. KING: We certainly agree that the
17 convention vests discretion with the court --

18 JUSTICE SOTOMAYOR: All right. So
19 let's stop with that question there. Maybe the
20 Second Circuit went too far in saying the
21 district court has to look at every possible
22 ameliorative measure, even those not raised by
23 the party. That seems contrary to the
24 adversarial system. Generally, we depend on
25 judges to rely on what the parties present.

1 MS. KING: That's right.

2 JUSTICE SOTOMAYOR: We don't make the
3 judge a -- a litigant by looking for things.

4 So assume we say you don't -- that
5 Second Circuit rule is too extreme. What if a
6 district court judge said: You know something,
7 yes, there's an ameliorative measure like he can
8 move away and we can wait two weeks and he would
9 do it, but I really don't want to bother waiting
10 those two weeks. I don't care whether it would
11 fix the problem or not.

12 You seem to be using the word
13 "discretion" to say, if the measures are
14 proposed, the judge never has to explain what
15 they think or, no matter what they think, we
16 have to uphold it --

17 MS. KING: Well, Justice Sotomayor --

18 JUSTICE SOTOMAYOR: -- or even any
19 delay whatsoever is enough of a reason not to do
20 it. That seems contrary to the concept that
21 there should be a reason for what you do and
22 that the reason should be based in the evidence
23 and that you shouldn't just say I don't want to.
24 You should give a reason.

25 MS. KING: We certainly were not

1 implying that it's unfettered discretion with no
2 limitations and that you can not give a reason
3 and reject submissions by the parties.

4 I think, in that circumstance, it
5 falls back to reasoned judgment as the judge
6 treats any evidentiary submission by the parties
7 below. There has to be reasoned consideration
8 and some reasoning for the -- the decision that
9 follows.

10 But I do want to clarify that the
11 hierarchy you posed of prioritizing return of
12 the child and only secondary consideration of
13 the safety of the child, I think, is incorrect.

14 The convention has multiple goals and
15 multiple purposes. Safety is, I think, the
16 preeminent one. The interests of the children
17 are cited as the paramount interest in the
18 preamble to the convention, expeditious
19 proceedings, which we all acknowledge is
20 definitely a goal, and return of the child is a
21 goal, but there are exceptions.

22 And the very existence of the
23 exception, the grave risk exception here, shows
24 that that goal is not without limitations. It's
25 not at all costs, as this Court has recognized

1 before. And there are certain values and
2 principles that are more important than prompt
3 return.

4 JUSTICE SOTOMAYOR: Thank you.

5 JUSTICE ALITO: I have a -- sort of a
6 threshold problem in understanding this statute
7 and the way the parties and the Solicitor
8 General have interpreted it.

9 Article 13(j) says that a requested
10 state is not bound to order the return of the
11 child who would otherwise have to be returned if
12 there is a grave risk, right?

13 MS. KING: Correct.

14 JUSTICE ALITO: So are there
15 circumstances in which you think a district
16 court could order the return of a child who
17 would be at grave risk?

18 MS. KING: I think that would become
19 an abuse of discretion unless there were some
20 extraordinarily unusual circumstances. But I
21 think --

22 JUSTICE ALITO: Yeah, I mean, just to
23 say it's an abuse of discretion doesn't really
24 answer the question for me.

25 What -- under what -- under what

1 circumstances would it not be an abuse of
2 discretion to do that? Under what circumstances
3 would it be permissible for an individual
4 district judge to say it's been proven by clear
5 and convincing evidence that there would be a
6 grave risk; nevertheless, send the child back?

7 MS. KING: If -- if there were some
8 balancing of grave risk and there was --

9 JUSTICE ALITO: And what?

10 MS. KING: -- a demonstration that
11 there's more grave risk in the present country
12 versus the return country. I think it would be
13 an extraordinary circumstance. And our position
14 would be it would be an abuse of discretion in
15 -- in the regular course.

16 JUSTICE ALITO: All right. Well, that
17 sounds like basically a categorical rule that
18 you can't do it, which is not what --

19 MS. KING: I -- I think --

20 JUSTICE ALITO: -- Article 13(j) says.

21 MS. KING: -- given the, you know,
22 different interests of the convention, which
23 places the child's safety as the paramount
24 interest, returning a child after finding that
25 there's clear and convincing evidence of grave

1 risk is -- is fundamentally antithetical to the
2 convention and, therefore, an abuse of
3 discretion.

4 JUSTICE ALITO: Okay. I think that's
5 a strong argument. I think it would have to be
6 based on something other than the convention
7 itself. It would have to be based on the way
8 the United States chooses to interpret the --
9 the convention. That could be done by statute.

10 But, since statute doesn't address
11 this, could it not be done by the courts in the
12 case law interpreting it?

13 MS. KING: Well, ICARA implements the
14 treaty and adopts the provisions of the treaty,
15 and I think that includes putting safety of the
16 child as the -- as the primary goal in -- in
17 interpreting the treaty and -- and -- and
18 handling these Hague cases.

19 JUSTICE ALITO: Well, do you see my
20 problem? I'm stuck on the idea that every one
21 of the district judges in the United States has
22 the discretion to decide whether I'm going to
23 return this child to the country where the -- of
24 habitual residence, despite the fact that it's
25 been shown that there would be a grave risk

1 there?

2 MS. KING: I -- I definitely think
3 that would be an abuse of discretion. And if it
4 makes sense --

5 JUSTICE ALITO: So there have to be
6 standards about when that would be done. I
7 don't know when. When would that be
8 appropriate? You don't think there are any
9 circumstances?

10 MS. KING: We don't think there are.

11 JUSTICE ALITO: Okay. So then it's
12 pretty much a categorical rule. And if it's
13 going to be a categorical rule, then doesn't
14 that lead you to something like what the Second
15 Circuit has done -- maybe they've gone too far
16 -- but to develop standards that have to be met,
17 such as providing ameliorative conditions in
18 that country so that the child would not be at
19 grave risk?

20 MS. KING: I mean, ultimately, we have
21 competing goals in the operation of the
22 convention and the Second Circuit in trying to
23 satisfy this ameliorative measures exercise,
24 which by itself is not -- by the way, is not in
25 the convention or ICARA, so this is already off

1 on a -- on a tangent. But that process cannot
2 apply for all cases because then you end up with
3 a delay situation. You may not be able to
4 satisfy --

5 JUSTICE ALITO: Right. Their -- their
6 standards might not be the right standards, but
7 do you dispute the fact that they -- do you
8 dispute the -- the proposition that it was
9 entire -- it's entirely appropriate for them or
10 for us to develop standards?

11 MS. KING: If the standards --

12 JUSTICE ALITO: Or are we just
13 supposed to say just --

14 MS. KING: No --

15 JUSTICE ALITO: -- abuse of
16 discretion? Every district judge just does
17 whatever the judge wants?

18 MS. KING: It is entirely appropriate
19 to develop standards that are consistent with
20 the convention and that come from the
21 convention's own requirements and limitations.

22 And Congress has also done that in
23 ICARA --

24 JUSTICE ALITO: Right.

25 MS. KING: -- by setting us a higher

1 evidentiary standard.

2 JUSTICE ALITO: And standards designed
3 to make sure that the child is not sent back if
4 there is a grave risk. If there's a grave risk,
5 with or without -- even with any ameliorative
6 conditions that could be put in appropriately
7 without undue -- unduly delaying the proceeding
8 or getting into custody determinations in the
9 country of habitual residence, then the child
10 cannot be sent back?

11 MS. KING: We certainly agree with a
12 standard that prevents sending children back to
13 situations where they are at grave risk of harm.

14 CHIEF JUSTICE ROBERTS: Justice
15 Breyer, anything further?

16 Justice Alito?

17 Justice Kagan?

18 Justice Gorsuch?

19 JUSTICE KAVANAUGH: Can you just
20 briefly summarize why you think a remand would
21 be problematic as compared to a reversal?

22 MS. KING: So this case has been
23 progressing for three and a half years at this
24 point. A remand would require more process
25 because there needs to be a reevaluation of the

1 current circumstances. A lot has happened in
2 the last two years since the -- the last return
3 order.

4 And that process alone, in the same
5 way that we object to the -- the categorical
6 sort of Second Circuit mandatory rule in the
7 first place, that process alone is damaging to
8 the child and inconsistent with the convention.

9 It's certainly a possible outcome
10 here, a possible remedy, but we think, on
11 balance, there is a safe and swift remedy
12 available to this Court and for this child, and
13 it would serve the child's interests and be
14 consistent with the convention to take that
15 remedy now and end this, rather than send it
16 back for a third bite at the apple.

17 JUSTICE KAVANAUGH: Thank you.

18 JUSTICE BREYER: You're -- you're
19 thinking -- maybe I will ask a question I -- I
20 think might be a problem. Judges in different
21 countries, there's a child in front of them.
22 The child is facing harm if they send him away.
23 And the judge is going to think whatever he
24 says, or she, hey, I've got this child here in
25 my country and I know that child is safe and

1 I'll be damned if I'm going to send him to some
2 other place that I don't even know about. Okay?

3 So there will be a tendency to keep
4 the child here. And I think what the Second
5 Circuit wants to say is remember the overall
6 purpose of this -- that treaty. It's trying to
7 stop kidnappings. And remember that. And try
8 and overcome your natural instinct, but pay
9 attention to it, but, but, but -- okay.

10 We, of all the courts, know least
11 about it. Family courts know about it. We
12 don't. You know about it. Federal courts
13 don't. Okay. What words do you suggest that we
14 write in this opinion which I think recognize
15 the motivating problems and -- and would try to
16 do what the Second Circuit is trying to do but
17 may be overkill?

18 What -- you're the expert. What words
19 would you like, if we can, to deal with the
20 problem I sketched?

21 MS. KING: Well, we would suggest that
22 after a grave risks finding, courts have
23 discretion to deny the petition for return or to
24 grant it subject to ameliorative measures. But
25 consistent with the convention, any

1 discretionary consideration of ameliorative
2 measures must be expeditious, it must not
3 entangle the court in custody matters, and any
4 measures imposed must be limited, enforceable,
5 and effective at protecting the child.

6 And just speaking to your point,
7 Justice Breyer, of the -- the court's instinct
8 to want to protect the child, these are cases
9 where the mother, in this case, has already
10 demonstrated by a very high evidentiary
11 threshold clear and convincing evidence that the
12 child is at risk of harm.

13 And in those types of cases,
14 protecting the child is a worthwhile instinct,
15 keeping in mind that the Hague process is an
16 interim measure. It's a temporary resolution to
17 keep the child while the custody courts, the
18 courts that have expertise and time to deal with
19 these complicated, very difficult issues -- they
20 are the ones that can move forward.

21 And the irony in this case is, because
22 of this detour, this child has not had that type
23 of custody hearing. And if this case had ended
24 three years ago, we wouldn't be here today. And
25 we think that the case should end today as well.

1 CHIEF JUSTICE ROBERTS: Justice
2 Barrett, anything further?

3 JUSTICE BARRETT: I do. Am I correct
4 that the vast majority of these grave risk cases
5 are ones involving domestic abuse or no?

6 MS. KING: There are certainly grave
7 risk cases of -- of all types. There is -- the
8 majority of them these days is now involving
9 domestic abuse, but only a very, very small
10 percentage get to the level of proving grave
11 risk by clear and convincing evidence. I'm
12 referring to the number of cases that raise the
13 grave risk defense.

14 JUSTICE BARRETT: Right. It just
15 seems to me that that's a much different case
16 for ameliorative measures than, say, the nuclear
17 plant next door that the Chief posited at the
18 outset. That would be a very -- pretty
19 straightforward move, and then there would be no
20 more grave risk, whereas I think you get into
21 the complexity of the financial support payments
22 and the -- the undertaking or restraining order,
23 however it should be categorized, in these
24 domestic abuse cases that pose maybe a unique
25 circumstance?

1 MS. KING: That's right, Justice
2 Barrett. I think that the nature of the grave
3 risk in a domestic violence case is extremely
4 complicated, and it gets into mental health
5 issues, psychological, very detailed family
6 issues, and it would be very difficult to
7 resolve that in an expedited proceeding, much
8 less try to resolve that thinking about what
9 it's like in a foreign country.

10 The coercive control elements. It's
11 not just about physical abuse. It involves
12 emotional, psychological, verbal, and all the
13 types of abuse that you alluded to.

14 JUSTICE BARRETT: So, as we're
15 tiptoeing up and talking about the discretion of
16 a district court, almost seems like what you're
17 suggesting is that in cases of domestic abuse,
18 ameliorative measures are not almost ever going
19 to be acceptable if you've proven the grave
20 risk?

21 MS. KING: We're not seeking a
22 categorical rule. It really depends on the
23 nature of the grave risk --

24 JUSTICE BARRETT: But a proceed --

25 MS. KING: -- and the circumstances.

1 JUSTICE BARRETT: -- with great
2 caution kind of rule?

3 MS. KING: Certain -- certainly, the
4 courts below, some of the circuits, have -- have
5 advised to proceed with caution and that there
6 should be great hesitation to try to solve this
7 type of complicated problem in an expedited
8 proceeding. And we agree with that.

9 JUSTICE BARRETT: Thank you.

10 CHIEF JUSTICE ROBERTS: Thank you,
11 counsel.

12 Mr. Liu.

13 ORAL ARGUMENT OF FREDERICK LIU
14 FOR THE UNITED STATES, AS AMICUS CURIAE,
15 SUPPORTING VACATUR

16 MR. LIU: Thank you, Mr. Chief
17 Justice, and may it please the Court:

18 The Second Circuit requires courts to
19 consider the full range of ameliorative measures
20 in every case involving a finding of grave risk
21 under Article 13(b). That mandatory rule has no
22 basis in the text of the convention, and,
23 indeed, Respondent hasn't identified any country
24 in the world that has held that the convention
25 imposes such a rule.

1 The convention instead leaves
2 consideration of ameliorative measures to the
3 discretion of the courts. And ICARA, which
4 Congress implemented -- enacted to implement the
5 convention, leaves that discretion undisturbed.
6 The Second Circuit's rule wrongly supplanted
7 that discretion in this case.

8 Accordingly, this Court should do what
9 it usually does when lower courts have
10 misunderstood the scope of their discretion. It
11 should vacate and remand for further
12 proceedings.

13 I welcome the Court's questions.

14 CHIEF JUSTICE ROBERTS: Well, one of
15 the problems here, as Ms. King pointed out, is
16 the delay. And you're sending it back after how
17 -- how many years has this been going on?

18 MR. LIU: About three and a half
19 years.

20 CHIEF JUSTICE ROBERTS: Three and a
21 half years, under a convention that is designed
22 to get this resolved quickly, for obvious --
23 obvious reasons. And you want there to be more
24 proceedings. What -- what do you think is going
25 -- going to happen on remand that is going to

1 put the district court in any different position
2 than it's in now?

3 MR. LIU: Well, we think the Second
4 Circuit's mandatory rule may well have distorted
5 the district court's analysis of the sufficiency
6 of the ameliorative measures in this case.

7 Under the Second Circuit's rule, which
8 is articulated at Petition Appendix 14a and 81a,
9 the district court had to order return "if at
10 all possible." That "if at all possible"
11 standard, in our view, places too heavy a thumb
12 on the scales in favor of return.

13 It essentially renders denial of
14 return a highly disfavored remedy, despite the
15 convention's objective of protecting the child
16 from grave harm.

17 And so, if this Court were to reject
18 the Second Circuit's rule and remove that thumb
19 from the scales, the district court may well
20 evaluate the sufficiency of the ameliorative --
21 of ameliorative measures differently on -- on
22 remand.

23 CHIEF JUSTICE ROBERTS: Yeah, I don't
24 -- not sure that touched on my main concern,
25 which was the additional delay that further

1 proceedings is.

2 MR. LIU: Oh. Well -- well, the --
3 the convention doesn't pursue any of its
4 objectives at all costs, not even the objective
5 of prompt adjudication. The convention also
6 cares about protecting children from the grave
7 risk of harm.

8 And we think the court that's in the
9 best position to evaluate whether this child
10 should be sent back in the face of a grave risk
11 of harm is the district court. That's because
12 the inquiry is highly fact-intensive and the
13 district court is the court that has the closest
14 and deepest understanding of the record.

15 JUSTICE GORSUCH: Counsel, if I can
16 follow up. My concern is similar to the Chief
17 Justice's, and I -- I think Justice Kavanaugh
18 touched on it.

19 The district court initially held, I
20 think, a nine-day bench trial and found a grave
21 risk and -- and -- and refused return before he
22 -- the court -- she was reversed by -- I think
23 by -- by the court of appeals.

24 So why isn't that in the entirely
25 appropriate, if -- if we agree with everything

1 you've said about the law, why isn't that the
2 appropriate conclusion in this case and
3 reversal, therefore, warranted? Because the
4 court did it -- nine days. I mean, you say it
5 should be thoughtful, and it was thoughtful. It
6 was supposed to be quick. It was quick. And
7 here we are three and a half years later.

8 MR. LIU: Well, I think the fact of
9 the matter is that Respondent has gotten two
10 bites at the apple at proving up ameliorative
11 measures.

12 JUSTICE GORSUCH: Now we have a third?

13 MR. LIU: Well, my point is that
14 Petitioner, in contrast, has had zero chance to
15 ask for a favorable exercise of discretion --

16 JUSTICE GORSUCH: Petitioner is happy
17 with the first judgment of the district court.
18 I'm pretty sure about that.

19 MR. LIU: Well, no, Petitioner --
20 Petitioner lost the first time at the district.

21 JUSTICE GORSUCH: At the court of
22 appeals, but the Petitioner, it was a grave risk
23 finding at -- at the district court.

24 MR. LIU: There was a grave risk
25 finding, and then the district court --

1 JUSTICE GORSUCH: That was it.

2 MR. LIU: -- the district court, under
3 the Second Circuit's mandatory rule --

4 JUSTICE GORSUCH: Yeah.

5 MR. LIU: -- felt bound to then
6 consider --

7 JUSTICE GORSUCH: But, if we -- if we
8 say no, if -- maybe I'm -- I'm -- I'm sorry if
9 I'm not being clear, but if we say that the
10 Second Circuit's rule is inappropriate --

11 MR. LIU: Correct.

12 JUSTICE GORSUCH: -- right, and the
13 district court after a nine-day trial found
14 grave risk, why doesn't that lead to a reversal
15 and -- and at least allow the parties in this
16 case to move on with their lives?

17 MR. LIU: If the Court thinks that the
18 proper exercise of discretion in this case in
19 the face of a finding of grave risk is to deny
20 return, then that is a perfectly acceptable
21 result. I am certainly not going to fight it.

22 The only reason why we think a -- a
23 vacatur and remand is appropriate is because we
24 think, after a finding of grave risk, there is
25 room for discretion for the district court to

1 analyze whether or not there's grave risk.

2 Now, of course, here, after the
3 district court's initial ruling, which -- which
4 denied return in the face of ameliorative
5 measures that were ultimately found to be
6 insufficient, there has been this Italian court
7 order that's entered the picture.

8 We think it would be perfectly
9 acceptable for the court now to consider, as it
10 did in the -- its most recent decision, the
11 effect of that order on ameliorating risk.

12 But the key point for us --

13 JUSTICE GORSUCH: If I understand it,
14 that -- that Italian order came about as a
15 result of this self-directed inquiry that the
16 district court did on remand on its own motion.

17 MR. LIU: Absolutely. And -- and we
18 -- we agree that when the Second Circuit in the
19 initial appeal found the original set of
20 ameliorative measures insufficient --

21 JUSTICE GORSUCH: I have trouble with
22 it too.

23 MR. LIU: -- I have a lot of trouble
24 with it -- the -- the Second Circuit should have
25 done one of two things. It should have simply

1 denied return, as I think Your Honor is
2 suggesting.

3 JUSTICE GORSUCH: Which is what he did
4 the first time -- she did the first time.

5 MR. LIU: Well, no, the first time she
6 -- she ordered return because she thought the
7 first set of ameliorative measures were
8 sufficient.

9 But, if the Second Circuit was right
10 that those measures were insufficient, what the
11 Second Circuit should have done was one of two
12 things: either simply deny return, or remand
13 the case for the district court to exercise its
14 discretion on whether to deny return.

15 What it should not have done is
16 mandate that the district court engage in
17 another round, another full examination of
18 whatever ameliorative measures exist, including
19 measures that Respondent had never even
20 proposed.

21 That added nine more months to the
22 proceedings that had already lasted 10 months.
23 And while it's true that we cannot undo the
24 procedural implications of the Second Circuit's
25 rule, that is, we can't go back in time and put

1 us back to where we were a -- a couple years
2 ago, what the Court can do in our view is undo
3 the substantive implications, which is to vacate
4 the judgment below and at least send it back for
5 the district court to take a fresh look at this
6 in light of the right standard.

7 JUSTICE KAGAN: Well --

8 JUSTICE GORSUCH: Thank you.

9 JUSTICE KAGAN: -- Mr. Liu, I guess
10 two questions. I -- I mean, suppose we were to
11 send it back and say, no, the Second Circuit
12 rule is wrong and you had discretion.

13 Number one, and this relates to
14 Justice Alito's question, could she then use her
15 discretion? Notwithstanding that the court had
16 found grave risk, could it nonetheless say, yes,
17 we're going to send the child back because there
18 are sufficient ameliorative measures? So the
19 first question is, could she make that order
20 without abusing discretion?

21 And I guess the second question is you
22 -- you know the record better than I do, and
23 you've read the various opinions more closely
24 than I have. Do you think that the district
25 court -- like, what do you think that the

1 prospects are that the district court would want
2 to do that?

3 I mean, once the Second Circuit rule
4 is taken away, do you think that there's really
5 any chance that the district court would have
6 said, yes, under my discretion, I think that
7 these ameliorative measures are sufficient so as
8 to send the child back?

9 MR. LIU: So, as to your first
10 question, Justice Kagan, we think it's possible
11 for the district court on remand to conclude
12 that return is appropriate in light of what the
13 district court views to be the sufficiency of
14 the measures. And that would not be an abuse of
15 discretion if the Court thought those measures
16 were, indeed, sufficient under a proper
17 understanding of the law.

18 As to your second question, I think
19 the record is, frankly, unclear what the
20 district court would do. This is a district
21 court that initially found -- this is Petition
22 Appendix 80a -- that this particular Respondent
23 has to date exhibited no capacity to change his
24 behavior.

25 And the Second Circuit on appeal, that

1 was the very reason the Second Circuit found the
2 first set of measures insufficient, because the
3 Second Circuit itself concluded that there was
4 ample reason to doubt whether Respondent would
5 comply with those conditions.

6 I think, once this Court -- if this
7 Court were to remove the thumb on the scales,
8 it's possible the district court would feel,
9 frankly, less pressure to conclude that return
10 was appropriate in light of these measures and
11 may well think that, although there are some
12 indications going both ways on whether
13 Respondent would or would not comply, it's
14 simply not worth the gamble to send the child
15 back.

16 I think it's that sort of
17 discretionary judgment that the discretion --
18 that the convention and ICARA leave to the
19 district court in a case like this. And because
20 the district court is most familiar with the
21 facts in the record, a remand would be
22 appropriate.

23 JUSTICE ALITO: Can I ask you the
24 questions that I asked Ms. King? To start out
25 with, does the United States think that there

1 are any circumstances in which it would be
2 lawful for a district judge to send a child back
3 to the country of habitual residence, despite a
4 finding that the child would be at grave risk?

5 MR. LIU: We do. The -- the
6 circumstance is limited, I think, to cases where
7 the risk of the child staying in the country
8 where the Hague Convention proceedings are
9 taking place is equally as grave or even graver.

10 I suppose that that's a very small set
11 of situations, but I certainly cannot rule it
12 out. And I think that's why, from the
13 explanatory report to the State Department's
14 original analysis of this convention in 1986,
15 we've always said, and everyone has always said,
16 that there is discretion left in the -- in the
17 judicial authority to send the child back even
18 in the face of grave risk.

19 JUSTICE ALITO: Okay. That's a very,
20 very narrow set of cases then, a very small set
21 of cases, as you just acknowledged.

22 MR. LIU: I agree.

23 JUSTICE ALITO: And would it be fair
24 to say that in this country that would be even
25 narrower than it might be in all of the

1 signatory nations?

2 MR. LIU: I -- I'm fairly confident
3 that's true, yes.

4 JUSTICE ALITO: So you're pretty close
5 to a categorical rule, if there's a grave risk,
6 the child can't be set back -- sent back.
7 However, ameliorative measures goes -- they go
8 to the issue of whether there would be a grave
9 risk.

10 MR. LIU: Right.

11 JUSTICE ALITO: Right?

12 MR. LIU: Well, I think -- I -- I
13 think there's --

14 JUSTICE ALITO: So the only question
15 that's left is how deeply can the court in one
16 of these proceedings get into the issue of
17 ameliorative measures. If it's something
18 simple, like moving away from a -- a toxic waste
19 dump, that's one thing, but if it --

20 MR. LIU: Right.

21 JUSTICE ALITO: -- if it gets into the
22 sorts of things that are generally done by
23 family courts in determining -- in -- in issuing
24 protective orders, custody determinations,
25 visitation rights, that sort of thing --

1 MR. LIU: We --

2 JUSTICE ALITO: -- are they completely
3 off the board? Are they possibly -- are -- are
4 they things that can be considered provided it
5 can be done expeditiously? What if they're
6 already in place?

7 MR. LIU: Well, we think that a
8 district court's consideration of ameliorative
9 measures should be entrusted to the court's
10 sound judgment, as many issues are under the
11 convention, and then reviewable for an abuse of
12 discretion.

13 Now I think there's a big difference,
14 though, between the general abuse of discretion
15 standard and the Second Circuit's rule, and I
16 think the line is crossed with the Second
17 Circuit's rule because it is not simply applying
18 a general -- generally applicable background
19 abuse of discretion standard, the sort of
20 appellate standard Congress certainly had in
21 mind when it enacted ICARA and granted the
22 courts jurisdiction.

23 Rather, the Second Circuit's rule is a
24 convention-specific rule that I think crosses
25 the line into implementing the -- the

1 convention, which is not a role that in this
2 country we entrust to courts. That is a role
3 that belongs to Congress only.

4 And so, when Congress enacted ICARA
5 against the background of general principles of
6 appellate review, it empowered courts to police
7 the discretion that lower courts are going to be
8 exercising and to --

9 JUSTICE ALITO: Well, what -- well,
10 what I get from your answer so far is that the
11 Second Circuit went too far in limiting the
12 discretion of the district court. But is it
13 inappropriate for a court of appeals that may
14 see a number of these cases -- I don't know how
15 many there are. There are not that many, I
16 don't believe. But, if they -- you know, if
17 they see a series of them, they have to have
18 some standards in determining --

19 MR. LIU: Right.

20 JUSTICE ALITO: -- whether there was
21 an abuse of discretion here and not an abuse of
22 discretion there. So the idea of their working
23 out standards to structure the exercise of
24 discretion is not inappropriate.

25 MR. LIU: It's not --

1 JUSTICE ALITO: It's not just, well,
2 the district court can do whatever the district
3 court wants so long as the court says this and
4 that and the other.

5 MR. LIU: Correct. And in -- and in
6 Part B of the United States' brief in this case,
7 we've tried to map out a basic framework for
8 thinking about these cases, sort of a procedural
9 reasonableness side of things having to do with
10 when arguments need to be considered and then a
11 -- a substantive reasonableness side of things
12 which has to go with exercises of judgment, like
13 the hypothetical you gave about sending a child
14 back in the face of a grave risk.

15 We think those sorts of general
16 principles are fine, and they reflect, I think,
17 what Congress anticipated courts doing when
18 Congress gave courts jurisdiction to consider
19 cases under the convention and to decide cases
20 in accordance with the convention.

21 Where the Second Circuit's rule goes
22 awry is that it sets up a rigid rule that, I
23 think, can only be understood as an
24 implementation of the treaty that it has no
25 power to do.

1 CHIEF JUSTICE ROBERTS: Just one
2 question, Mr. Liu. It -- it seems to me that
3 we're in a very unfortunate position because we
4 have a very unrepresentative record, and we're
5 trying to develop a rule that applies in more
6 representative cases.

7 You know, this thing says -- this --
8 this convention and the statute says we're
9 supposed to act -- district courts are supposed
10 to act expeditiously. But what they mean -- and
11 -- and a lot of times, when we're told to move
12 promptly, it -- you know, that means two years
13 instead of four -- but, here, it says we -- the
14 judge is supposed to reach a decision within six
15 weeks, and if he doesn't, he or she doesn't, you
16 know, he's got to explain it to the central
17 authority about why it's taking so long.

18 MR. LIU: Right.

19 CHIEF JUSTICE ROBERTS: And what
20 consideration of ameliorative conditions after a
21 determination of grave risk means in that
22 context, it has to be -- I mean, everybody in
23 these cases wants desperately to make sure they
24 get the right answer, but that means you've got
25 to kind of move fast and loose to get it done in

1 time.

2 And that sounds bad with respect to
3 the person -- the child's grave risk
4 possibility, but, on the other hand, as Justice
5 Breyer pointed out, the -- the other side, it's
6 kidnapping.

7 So how are we supposed to take all of
8 those things, how are the district courts
9 supposed to take all of those things into
10 account within six weeks? It's not like a case
11 like this where you get -- you contact the
12 Italian authorities. They say we're going to do
13 this. You go through all that. That's not how
14 it's supposed to happen.

15 Now Justice Alito is asking about
16 whether there should be a categorical rule, and
17 that certainly would speed things up, and maybe
18 that makes a lot of sense.

19 MR. LIU: Well, we think our abuse of
20 discretion standard will speed things up, just
21 like the -- the rule this Court announced in
22 Monasky, because it will -- it will at least
23 speed up the appeal by -- by allowing courts of
24 appeals to really not need to take as deep of a
25 -- of a look as they otherwise would under de

1 novo review.

2 But to the question about how district
3 courts can handle this, although we agree with
4 Petitioner that the grave risk inquiry is
5 analytically distinct from the ameliorative
6 measures inquiry, we don't think those two
7 inquiries need to happen, in terms of timing,
8 one after another.

9 A district court can sequence them so
10 that they're happening at the same time. Just
11 as you would hear a trial about the elements of
12 an offense along with defenses at the same time,
13 all of those things can happen together.

14 And district courts, in the cases
15 we've seen, have been -- have proved quite
16 capable of hearing -- of holding very prompt
17 hearings where live witnesses are called in, the
18 parents will testify, sometimes the child will
19 be interviewed in camera. And -- and -- and so
20 we -- we've seen district courts be able to move
21 expeditious -- expeditiously in cases like this.

22 CHIEF JUSTICE ROBERTS: Justice
23 Breyer, anything further?

24 Justice Alito?

25 JUSTICE SOTOMAYOR: Yes. I'm

1 borrowing a page from questioning of one of my
2 colleagues usually. Tell me how to write this
3 for the district court in this case.

4 MR. LIU: Sure.

5 JUSTICE SOTOMAYOR: This district
6 court was guided by the principle, erroneous
7 according to you --

8 MR. LIU: Right.

9 JUSTICE SOTOMAYOR: -- that, if at all
10 possible, the child must be returned. So how do
11 we tell the district court judge it's not merely
12 a possibility? What is it?

13 MR. LIU: Well, I think the goal --

14 JUSTICE SOTOMAYOR: What -- what is
15 the issue that you have to be addressing?

16 MR. LIU: I think the overarching
17 issue is whether, in the face of a finding of
18 grave risk, there are countervailing
19 considerations that nevertheless render return
20 appropriate.

21 Now, granted, that is a broad
22 standard, but I think it avoids what the Second
23 Circuit's rule does, which is to put a thumb on
24 the scales one way or the other on return or
25 denying return.

1 And I think what the opinion could say
2 is, District Court, please take another look at
3 the sufficiency of these measures and other
4 considerations that might weigh against return
5 in light of the fact that there is no thumb on
6 the scales.

7 CHIEF JUSTICE ROBERTS: Justice Kagan?

8 JUSTICE KAGAN: Mr. Liu, would you
9 clarify something for me? Because I think I'm a
10 little bit confused because different people are
11 using this term "grave risk" in different ways,
12 sometimes to mean the preliminary determination
13 before consideration of ameliorative measures
14 and sometimes maybe to mean the final
15 conclusion, like, even with ameliorative
16 measures, there's still a grave risk.

17 So when -- when you said -- I think it
18 was to Justice Alito maybe, when you said it
19 would be extraordinary to send a child home if
20 there was a finding of grave risk, I mean, that
21 -- on one view, that means, like --

22 MR. LIU: Right.

23 JUSTICE KAGAN: -- oh, you can find
24 all the ameliorative measures in the world and
25 it would still be extraordinary. On another

1 view, you only meant grave risk after --

2 MR. LIU: I meant --

3 JUSTICE KAGAN: -- the ameliorative
4 measures were considered.

5 MR. LIU: -- in that context --
6 correct. In -- in that response, I meant only
7 grave risk after considering ameliorative
8 measures and their effect on the grave risk.

9 JUSTICE KAGAN: Okay. And -- and --
10 and if we were to try to figure out some
11 standards on the -- on this view that's like,
12 wow, tell every district court judge in America
13 you have all the discretion you want about how
14 to consider ameliorative measures, and I -- you
15 know, write -- write me a paragraph, along the
16 lines of Justice Sotomayor's question, what --
17 what standards does the State Department, does
18 the U.S. Government think would be appropriate?
19 I mean, what -- what -- what should guide the
20 district court's discretion in the U.S.
21 Government's view?

22 MR. LIU: Well, we think there are --
23 to draw a contrast with the Second Circuit's
24 view, there are four categories of cases where a
25 court could reasonably decline to consider

1 ameliorative measures.

2 One category is where the parties
3 simply haven't raised any. Another category is
4 where the measures clearly have no chance of
5 working. Another category is where the measures
6 would usurp the role of the child custody court
7 in the court -- in the country of habitual
8 residence. And a fourth is where consideration
9 of the measures would unduly prolong the
10 proceedings.

11 Those are instances where a court
12 could reasonably conclude that it's just not
13 worth the candle to go through and consider
14 ameliorative measures. But there are going to
15 be other cases that don't fall within those four
16 buckets where it's going to be perfectly
17 appropriate and, indeed, the best and most sound
18 exercise of judgment to consider the measures
19 that the parties had put before them.

20 Maybe they've already obtained the
21 order, the protective order, so there -- there's
22 no concern about a delay in the proceedings.
23 Maybe that order is -- is -- well, because it
24 was already issued, doesn't raise any concerns
25 at all about whether it would usurp the -- the

1 role of the court overseas.

2 And -- and so there are certainly
3 instances where we would -- we would encourage
4 and have no problem with courts considering
5 ameliorative measures, so long as they -- they
6 -- they abide by the other objectives of the
7 convention and prompt adjudication avoiding
8 venturing into the merits of the underlying
9 dispute.

10 CHIEF JUSTICE ROBERTS: Justice
11 Gorsuch?

12 JUSTICE KAVANAUGH: Do you agree with
13 the statement that the Petitioner makes at page
14 17 of the brief that says "ameliorative measures
15 will almost never be appropriate in the context
16 of domestic violence"?

17 MR. LIU: We think that's probably too
18 strong. I think we would avoid any sort of
19 categorical statement about domestic violence
20 cases and whether the measures would be
21 sufficient.

22 The fact of the matter is even
23 domestic violence cases vary in terms of their
24 facts and circumstances. And I think it would
25 be kind of, you know, making the same error to

1 then put a thumb on the scale the other
2 direction in domestic violence cases.

3 So I -- I would just -- I would just
4 be cautious about any sort of categorical
5 statement about domestic violence cases.

6 JUSTICE KAVANAUGH: Won't those cases,
7 though, tend to have the kinds of conditions
8 that you were talking about as saying, I think,
9 that ameliorative measures will be unlikely to
10 work, it'll take a while, it's difficult to
11 ensure it's going to work, usurping the role of
12 the custody, those --

13 MR. LIU: Yeah. I --

14 JUSTICE KAVANAUGH: -- it seems like
15 those are going to be present in -- in most, and
16 -- and they said almost never, not never.

17 MR. LIU: I think those -- those
18 circumstances may well be present in a fair
19 number of domestic violence cases. And I think
20 it's true that domestic violence cases raise
21 those concerns more than other types of cases.

22 I -- I would just be wary about
23 setting up any sort of general presumption.

24 JUSTICE KAVANAUGH: Well, what about,
25 just to add to that, this is supposed to be a

1 temporary determination as well. This is not
2 the final determination. This is just kind of a
3 holding pattern until we get the custody
4 determination, to pick up on the Chief Justice's
5 points.

6 And when you combine that with what I
7 think you've acknowledged about the domestic
8 violence cases, it seems difficult to -- to
9 think that ameliorative measures will be able to
10 be assessed, determined in that kind of quick
11 period, and why would you want to in a temporary
12 -- when it's just a temporary hold?

13 MR. LIU: I think those are all fair
14 points. I think a district judge who adopted
15 that sort of reasoning would be on pretty solid
16 ground.

17 I -- I -- the reason why I'm holding
18 back is because these cases are so different
19 factually that I -- I don't want to say anything
20 that would suggest there's a rigid rule going
21 the other way in these sorts of cases.

22 JUSTICE KAVANAUGH: I appreciate it.
23 Thank you.

24 CHIEF JUSTICE ROBERTS: Justice
25 Barrett?

1 JUSTICE BARRETT: So I think my
2 sticking point is the same one that others have
3 asked you. It's difficult to figure out how to
4 write this paragraph.

5 In your answer to Justice Kagan, I
6 mean, I understand why the United States doesn't
7 want to box itself in to a particular thing, but
8 it, frankly, wouldn't give district courts that
9 much guidance.

10 And you were talking about not putting
11 a thumb on the scale because -- at risk of
12 falling into the error that the Second Circuit
13 may have fallen into. But it did more than have
14 a thumb on the scale. I mean, it had a
15 categorical rule.

16 And I don't see anything in the United
17 States' position that would prevent -- Justice
18 Alito talked about each court of appeals
19 developing standards to guide the exercise of
20 discretion. I don't see anything in what the
21 United States has proposed that would prevent a
22 thumb on the scale one way or another.

23 You know, in -- in my discretion, I am
24 generally going to use extreme caution, as I
25 suggested to Ms. King, before imposing

1 ameliorative measures in a domestic violence
2 case. It seems to me like those are the kinds
3 of things that shape discretion.

4 And as Justice Kavanaugh said, it
5 seems like, in these complex domestic
6 violence-type cases, all of the risks that
7 you're talking about would be present.

8 So would it really be so bad if we try
9 to -- if we send it back, offer something in the
10 way of guidance, even if it is simply to say,
11 yes, district courts have discretion that should
12 be exercised consistent with ICARA and the Hague
13 Convention; however, given these concerns and
14 how they are often present in domestic violence
15 cases, use caution before going forward with
16 them in that context?

17 MR. LIU: I think so long as there's a
18 substantial caveat that there may be other cases
19 even in the domestic violence context where
20 ameliorative measures are appropriate, that that
21 would be fine.

22 You know, the United States is in a
23 position where we have children, of course,
24 abducted from foreign countries who are here,
25 but we are also in a situation where we have

1 children from the United States abducted to
2 other countries.

3 And there may be allegations of
4 domestic violence in those cases, and we want
5 the judges abroad to also take into account the
6 specific circumstances of each case and -- and
7 -- and be sensitive to how those differences may
8 or may not make ameliorative measures in that
9 case an appropriate remedy.

10 So -- so we -- I'd -- I'd -- I -- I
11 would simply, you know, make sure that I got
12 across that the United States is on both sides
13 of -- of -- of -- of the issue of whether the
14 child is incoming or outgoing.

15 JUSTICE BARRETT: That's very helpful.
16 Thank you, Mr. Liu.

17 CHIEF JUSTICE ROBERTS: Thank you,
18 counsel.

19 MR. LIU: Thanks.

20 CHIEF JUSTICE ROBERTS: Mr. Min.

21 ORAL ARGUMENT OF RICHARD MIN
22 ON BEHALF OF THE RESPONDENT

23 MR. MIN: Mr. Chief Justice, and may
24 it please the Court:

25 The convention's text, context, and

1 purpose require that reasonable ameliorative
2 measures be considered when adjudicating these
3 complex family abduction cases.

4 To refuse to consider measures that
5 might allow for the safe return of children back
6 to their home country would be an abuse of
7 discretion and would violate the purpose of the
8 convention, which is built on a system of mutual
9 trust between signatory nations.

10 This approach supported by the Hague
11 Conference ensures consistent results here in
12 the United States and expectations for U.S.
13 children abducted abroad by providing courts
14 clear guidance on how to evaluate this
15 exception.

16 The lower court here took into
17 consideration the unique facts of this case and
18 of this family.

19 Specifically, the limit in provisional
20 order in this case addressed the grave risk of
21 harm to this child which was caused by potential
22 exposure to domestic violence between the
23 parties.

24 The return order helps to -- to deter
25 future abductions, which Congress has found to

1 be harmful to children, while also protecting
2 the interests of this child, ensuring that the
3 custody dispute takes place in Italy, his home
4 country.

5 The core premise of the convention is
6 that the interests of children in matters
7 relating to their custody are best served when
8 custody decisions are made in the country of
9 habitual residence.

10 Ultimately, the treaty is not about
11 who should have custody but, rather, where those
12 decisions should be made.

13 The Italian courts have already issued
14 orders protecting this child, and they have
15 scheduled -- scheduled a hearing in June to
16 address issues of custody.

17 As this Court found in *Abbott*, there
18 is no reason to doubt the ability of other
19 contracting states to carry out their duty to
20 make decisions in the best interest of children.

21 Further, as this Court found in
22 *Monasky*, domestic violence should be an issue
23 fully -- fully explored in the custody
24 adjudication upon the child's return.

25 The Court should, therefore, affirm

1 the order directing the immediate return of
2 B.A.S. back to Italy.

3 I'm happy to entertain any questions.

4 CHIEF JUSTICE ROBERTS: This
5 ameliorative conditions doctrine, rule, it -- it
6 has no basis in the convention or the statute,
7 right, and by which I mean it's not its --
8 concept that the statute or the convention
9 refers to? Grave risk is all that we're talking
10 about, right?

11 MR. MIN: Yes, but we believe at --
12 it's inherent and implicit in the text of the
13 convention, meaning that grave risk, the Article
14 13(b) grave risk inquiry, necessitates an
15 analysis of the future risk of harm to the
16 child, including any potential mitigating
17 factors.

18 This is an approach that the United
19 States themselves supported in the Blondin
20 second appeal. On page 21 of their amicus
21 brief, they said -- and they supported the
22 Blondin II language, saying it supported that
23 past abuse should not constitute a finding of
24 grave risk of harm without the additional
25 finding that there's a likelihood of and no

1 adequate option to prevent future abuse upon
2 return, which means that to find a grave risk of
3 harm, you must find there's no way to protect
4 the child upon return.

5 CHIEF JUSTICE ROBERTS: Well, but by
6 creating ameliorative conditions as sort of a
7 separate concept, it's almost like you're adding
8 a subsection to -- to 13. It does have the
9 potential, and maybe the -- I don't want to say
10 inevitable, but the likelihood of extending the
11 -- the proceedings.

12 It's -- it's one thing if you just
13 factor it into determining whether there's a
14 grave risk. It's another thing if you say,
15 okay, you've got grave risk. Now what kind of
16 conditions can we impose? Because, once you do
17 that, you're talking about ameliorative
18 conditions that are added as the process goes
19 on.

20 You know, oh, you -- you think it's
21 risky that there's this? Okay, here's what
22 we're going to do. Or this? This is what we're
23 going to do. As opposed to things that are -- I
24 mean, could be factored into the grave risk
25 concerns as part of the same process. It's a

1 bad thing that, you know, the child is in this
2 situation or this is going to affect him or
3 where the education is going to be or whatever,
4 and in the process of debating that, simply say,
5 well, this is what we're going to do, this can
6 happen, but not sort of extend it as a whole
7 separate inquiry.

8 MR. MIN: Well, we agree that it
9 should be a one-step process and the analysis
10 should be done in the same stage. However, we
11 also believe that, pursuant to the language of
12 Article 13 and 18 of the convention, that the
13 court has discretion to return a child even with
14 a grave risk finding in place.

15 That discretion, as Justice Alito
16 mentioned earlier, would reasonably only occur
17 if there were sufficient ameliorative measures
18 in place to return a child. We agree that,
19 absent measures to protect a child, it would be
20 highly unusual to direct a return of the child
21 after a grave risk finding.

22 However, there are certain
23 circumstances where they may -- that might be
24 appropriate, such as if the abducting parent is
25 creating the situation of grave risk in the home

1 country, such as refusing to obtain an order of
2 protection or refusing to seek some sort of
3 relief that might protect the child. The court
4 may in that circumstance decide that, balancing
5 the factors, one, to deter future abductions,
6 they will not sanction behavior of abducting
7 parents who do not cooperate in efforts to
8 protect the child upon return and, therefore,
9 return the child notwithstanding a grave risk
10 finding.

11 But the United States' position again
12 in the Blondin II amicus brief -- or the -- the
13 Blondin amicus brief talked about the fact that
14 the system is built on mutual trust and
15 cooperation. Ultimately, the purpose of the
16 convention is to believe that the foreign courts
17 can protect children. It will lead to
18 consistent results here and abroad.

19 JUSTICE BREYER: I'm afraid of writing
20 anything. You see the problem? It seems to me
21 that why isn't the -- the right group to write
22 something -- there -- there are bureaus and
23 there are people who have this as their
24 profession. We're not a family court, and any
25 word we write is capable of being used in a

1 context, in a case where it does not belong.

2 Okay?

3 So, when you say let's put our thumb
4 -- that's what Justice Barrett said -- yeah,
5 okay, that seems like the best possible
6 approach. And even there, I'm not certain of
7 what thumb and what those words should be.

8 A family court judge has the hardest
9 judge, in my opinion, in this system. And --
10 and so what do we say? I take it you agree that
11 what the Second Circuit said must be wrong. I
12 mean, there will be cases where there is nothing
13 to be said about undertakings and you shouldn't
14 go into it, Judge, or you're going to be here
15 for five years, and the child shouldn't be sent
16 back to Afghanistan because they're bombing
17 every five minutes. And I can make up some
18 other country if I need to.

19 And, you know, so -- so it can't be an
20 absolute rule in my opinion, but go ahead,
21 answer that. Tell me why it has to be --

22 MR. MIN: Well, there is a --

23 JUSTICE BREYER: -- why we should
24 write something and what those words should be
25 in your opinion.

1 MR. MIN: To clarify, there is a
2 distinction between consideration and
3 implementation of ameliorative measures.
4 Consideration, as the case law suggests in the
5 Second Circuit, can be instantaneous. A court
6 can say: Well, a child was abducted from
7 Afghanistan. I've considered if there's
8 anything we can do to protect the child. I
9 don't believe there is anything because the
10 entire country is being bombed, using Your
11 Honor's example.

12 That is consideration. That is what
13 the Second Circuit rule has implemented. The
14 Second Circuit case law is very clear that they
15 have not remanded cases historically to -- for
16 failure to consider all available ameliorative
17 measures, the full panoply, as the United States
18 and as Petitioner believes the rule states.

19 The application of the rule is that
20 the court examines the record put before them,
21 considers some very readily accessible and
22 easily available ameliorative measures, which
23 the United States has supported, and in that
24 limited purpose considers normal protective
25 measures, such as orders of protection, whether

1 or not supervised visitation can be put in
2 place.

3 For example, the medical case is -- as
4 part of grave risk, is very illuminating to use
5 as an analogy. In the Ermini case -- in the
6 Ermini case and I believe the Eidem case in the
7 Second Circuit, the abducting parent was
8 required to show that there was no medical
9 treatment available in the home country before
10 the court could find that there was grave risk
11 of harm.

12 This is precisely our argument, that
13 connected to the grave risk inquiry, one must
14 show that the child cannot be protected or
15 cannot be treated in the home country. It's not
16 sufficient to show, well, the child can get
17 medical treatment in the United States; we don't
18 have to worry about what's available in the
19 other country. They must engage in some sort of
20 analysis of what is possible and appropriate in
21 the home country before --

22 JUSTICE GORSUCH: So, Mr. Min, I just
23 want to see if you agree with Mr. Liu, and his
24 -- he -- he gave us at least four things that he
25 thought we could -- we could get our hands

1 around when it comes to ameliorative measures.
2 And I understand your point that we have to
3 determine whether there's a grave risk in the
4 home country and medical conditions.

5 But he said that you don't have to
6 consider measures that are not raised by the
7 parties, one. Two, you -- you don't have to --
8 you don't have to pursue things that were not --
9 that are not -- that are obviously not workable.
10 Three, you don't have to consider measures that
11 would usurp local authority. And, four, he
12 said, you can -- you don't have to consider
13 measures if it would prolong proceedings
14 significantly.

15 Do you disagree with any of those?

16 MR. MIN: Yes. Starting from the
17 first one, the United States in their own brief
18 suggested that the courts can sua sponte
19 consider available measures --

20 JUSTICE GORSUCH: No. I -- I -- of
21 course, it can, but it doesn't have to, is --
22 is, I believe, as I understood Mr. Liu, that --
23 that -- that it's not required to. It wouldn't
24 be an abuse of discretion if it failed to
25 consider sua sponte measures on its own.

1 And -- and that may be the fundamental
2 problem with the Second Circuit's approach,
3 right? Is that it -- it -- it seemed to suggest
4 the district court had to go out and investigate
5 measures on its own, as Justice Sotomayor
6 suggested.

7 So, again, those four things, any
8 problem with any of them? That one doesn't
9 count.

10 MR. MIN: Well, we believe that the
11 Hague Conference in their guide to good practice
12 has stated that the courts must consider
13 available and readily accessible ameliorative
14 measures. And we agree that would be the
15 appropriate --

16 JUSTICE GORSUCH: So "available" would
17 be presented by the parties, and "readily
18 accessible" would, I -- I think, track what --
19 what Mr. Liu said in things -- it could throw
20 out things that were obviously not workable,
21 that that wouldn't be an abuse of discretion.

22 So I haven't heard anything that --
23 from you and I haven't read anything in your
24 brief that I recall that -- that disagrees with
25 these, at least these four things. What would

1 you say?

2 MR. MIN: Well, I think, if the
3 parties did not present an option such as moving
4 away from the nuclear plant and if the court
5 considered that as a very easily accessible and
6 readily available ameliorative measure, the
7 court would have a -- a duty to consider
8 something that is very knowable in those
9 circumstances, such as --

10 JUSTICE GORSUCH: On its own?

11 MR. MIN: Yes, on its own, because --

12 JUSTICE GORSUCH: Okay. Let's say we
13 disagree with that, and we -- we -- you know, we
14 don't normally have, as Justice Sotomayor says,
15 an inquisitorial justice system. It's an
16 adversarial one in this -- this country. Then
17 what?

18 MR. MIN: Well, the United States has
19 supported judges reaching out to the
20 international network of Hague judges. And we
21 should remember that Congress has promoted or
22 says that there should be uniform interpretation
23 internationally of this convention, which means
24 that it should work not only for the United
25 States courts but also international courts and

1 that courts all around the world should apply
2 the provisions of the convention fairly
3 uniformly.

4 So the United States has supported
5 courts and district judges reaching out to the
6 international network of Hague judges. We agree
7 that that should be something that courts
8 consider in cases of grave risk of harm.

9 We also believe that the presumption
10 should be in all cases that the home country can
11 protect children. That is the system that this
12 convention is built on. And inherent in that
13 system would be an acknowledgment that most
14 countries have orders of protection, custody
15 courts that can supervise children, that these
16 are things that courts should sua sponte
17 consider before rejecting the efficacy of these
18 measures.

19 Now, again, the simple fact that they
20 consider this, even if it is just a fleeting
21 thought, is sufficient. And the Second Circuit
22 case law does not require that they do anything
23 further than that.

24 On the second point, we agree,
25 obvious, readily accessible, available remedies

1 is what the court should be mandated to
2 consider. The Second Circuit language in case
3 law, as inartfully as it might be drafted,
4 again, in practice, is not applied the way that
5 Petitioner and the United States paints it.

6 It -- it is more restrictive, meaning
7 that they do defer to the district court's
8 analysis of the record and proposals. The
9 Davies case, which occurred the year before this
10 case in the Second Circuit, the district court
11 denied the return to French St. Martin after
12 ameliorative measures and undertakings were
13 proposed. The -- on remand, the Second Circuit
14 did not -- on -- on appeal, the Second Circuit
15 did not remand for failure -- failure to
16 consider the full plan -- panoply of
17 ameliorative measures, for failure to consider
18 all theoretical ameliorative measures. They
19 simply affirmed stating the -- the district
20 court considered the record put forth before
21 them, considered available ameliorative
22 measures, and agreed that the child should not
23 be returned.

24 CHIEF JUSTICE ROBERTS: Counsel, I'm
25 sorry, I'm about 90 seconds behind you. But you

1 said that the consideration can be fleeting. It
2 doesn't have to be terribly involved.

3 How would you describe the
4 consideration in this case? Certainly far
5 beyond on fleeting, right? Quite elaborate,
6 ongoing, getting the international --
7 international courts involved?

8 MR. MIN: Yes.

9 CHIEF JUSTICE ROBERTS: So -- so would
10 you at least acknowledge that the depth of
11 consideration went far beyond what would be true
12 in the normal case?

13 MR. MIN: Well, in this case, the
14 parties, again, proposed substantial
15 ameliorative measures during the evidentiary
16 portion of this case.

17 It was only after the Second Circuit
18 remand that the court engaged in further
19 analysis and trying to convert the mostly
20 undertakings and ameliorative measures into more
21 enforceable orders.

22 Of course, to some extent, the
23 analysis or evaluation of ameliorative measures
24 is a -- a process that would take time, of
25 course, but the United States themselves in --

1 again, in the Blondin amicus brief, criticize
2 the grave risk process, which required expert
3 testimony, and said that it would result to
4 delays and prolonging cases.

5 And in my experience, it is grave risk
6 analysis itself that often leads to long delays
7 in the adjudication of these cases. There's --
8 very rarely do grave risk cases get resolved
9 within six weeks. They require expert
10 testimony. They require the analysis of the
11 foreign country's mechanism and legal system.

12 In this case, Petitioner put their
13 case on first because they were trying to
14 substantiate the exception, and in their case,
15 they called an Italian legal expert who
16 criticized Italy and also criticized the U.S.
17 system for protecting domestic violence, and
18 they also called two experts on -- on grave risk
19 of harm.

20 So simultaneous with that evidence
21 being adduced, the question of ameliorative
22 measures was also presented. So the -- there is
23 no real time delay that would be created by
24 considering ameliorative measures. And,
25 certainly, one must consider the overarching

1 purpose of the convention, which is to return
2 children back to their home country.

3 Ultimately, the question that I've
4 heard from several Justices is about the rule
5 that should be provided to courts in these types
6 of cases. And we believe that, very simply, the
7 Court must consider all evidence of ameliorative
8 measures that are presented to them by either
9 party during the course of proceedings, that it
10 is Petitioner or the abducting parent's burden
11 to overcome the presumption that the courts in
12 the system in the home country are capable of
13 protecting children and that that presumption
14 may be overcome by evidence stating that they
15 have either attempted to secure protection and
16 were denied that protection, which would -- can
17 lead a district court to conclude that that
18 country cannot protect that child, or by
19 producing some sort of evidence through experts
20 or other means about the deficiencies in that
21 legal system.

22 JUSTICE SOTOMAYOR: Counsel, not in my
23 experience, but I have followed some of these
24 cases with care.

25 If a court decides I'm not altogether

1 sure about whether the abuse occurred or, if the
2 abuse occurred, it occurred in the manner that
3 the petitioner says -- not the petitioner, that
4 the respondent says -- I think that that issue
5 is one that should be looked at more closely by
6 the court making the custody decision. I need
7 to rule expeditiously in this case.

8 So given my deep uncertainty, I'm not
9 sure I'm going to make a grave risk finding or
10 I'm going to find there may be a risk, but I'm
11 not sure of its extent, I think these measures
12 are enough to return the child, what mechanism
13 is there for a court to do that?

14 MR. MIN: So Hague cases are often
15 described as summary proceedings.

16 JUSTICE SOTOMAYOR: Right.

17 MR. MIN: There are several rules that
18 allow for expeditious proceedings, such as the
19 requirement that documents not have to be
20 authenticated to be produced as evidence.

21 We believe that a mandatory
22 consideration will speed up resolution of these
23 cases. First, it gives clear guidance to -- to
24 district court judges --

25 JUSTICE SOTOMAYOR: No, I --

1 MR. MIN: -- how to evaluate --

2 JUSTICE SOTOMAYOR: -- I understand
3 all of that, counsel.

4 MR. MIN: Summary judgment --

5 JUSTICE SOTOMAYOR: I -- I -- the
6 assumption here has been that there's been a
7 grave risk finding, but, as I indicated,
8 especially in domestic abuse cases, they're --
9 they're messy, and who's abusing whom and to
10 what extent and under what circumstances is
11 always at issue. Okay?

12 What legal mechanism is there for a
13 court who's unsure, I don't want to make a grave
14 risk finding because I think that that really
15 belongs to the custody court, I'm on the margin.
16 Could, without that finding, a court say I'm
17 going to return you?

18 MR. MIN: Yes. We believe that
19 through summary judgment motions and processes,
20 that if there is a mandatory consideration of
21 ameliorative measures, that the left-behind
22 parent can put forth evidence that taking the
23 abducting parent's allegations at their extreme,
24 which is what the United Kingdom does in their
25 analysis, taking their allegations at face

1 value, there are sufficient ameliorative
2 measures that would still protect the child,
3 then they do not have to go through the thorough
4 analysis and evidence-gathering to figure out
5 whether the allegations are then themselves
6 true.

7 And this is something that the Hague
8 Conference has talked about in their guide to
9 good practice. And so that would in effect
10 speed up these cases considerably.

11 JUSTICE BREYER: I mean, why can --
12 what about saying that -- I'm looking for the
13 thumb -- not say it quite in those words. After
14 all, the U.K. is talking about a special treaty
15 that includes the EU countries where they know
16 the courts have these particular things maybe.

17 But just say the question's difficult,
18 has to do with whether there really will be a
19 grave risk or whether there won't be a grave
20 risk, and we'd recommend or it's quite possible
21 the district court is free to consult the
22 guidance of experts on the subject, for example,
23 the March 9, 2020, statement issued by the Child
24 Abduction Convention guide by the Permanent
25 Bureau of the Hague Conference, whatever it is,

1 we cite that. But we don't tell them they have
2 to do it.

3 We just say, in an appropriate case,
4 the judge is free, of course, to consider the
5 views of those who work in this field, such as.

6 Now we don't have to say too much and
7 they'll do it, you know, I mean, so what about
8 something like that, and not in every case but
9 in an appropriate case?

10 MR. MIN: Again, we believe and we
11 agree with the United States that discretion
12 should be guided by sound legal principles and
13 the large object -- objectives of the
14 convention.

15 We believe that it would be an abuse
16 of discretion for a court to fail to consider
17 very reasonable and accessible and available
18 ameliorative measures in cases where they may
19 help the return of the child back to the home
20 country.

21 Again, if they -- if it's an extreme
22 case where an abductor has violated and shown a
23 propensity to violate court orders in the past,
24 where the abducting parent has sought orders of
25 protection and sought the refuge of police in

1 the home country and they have not offered their
2 assistance back home, in those types of cases,
3 the court can easily consider and say: I've
4 thought about how we could protect this child,
5 none of them I think will work, and they can
6 move on to their final decision.

7 We do not believe that the mandatory
8 consideration adds any more time because, if
9 they believe that it could assist in returning
10 the child and implemented that, then it would
11 take the same time whether it was discretionary
12 or mandatory, and it would take the same time if
13 they denied the implementation of the
14 ameliorative measures.

15 Again, the consideration versus
16 implementation is an important distinction. A
17 lot of the concerns here are about implementing
18 ameliorative measures. But even if we concede
19 or even if we accept that ameliorative measures
20 are discretionary, the implementation of them
21 will, of course, take some time.

22 Now, in this case, when Ms. Golan
23 actually sought the order of protection in
24 December 2019, she obtained it one week later.
25 So there really was no delay in obtaining the

1 necessary ameliorative measures to protect this
2 child in this case, and oftentimes there will
3 not have to be.

4 If this Court does not have any
5 further questions, we certainly would urge this
6 Court to affirm the return of B.A.S.

7 As I stated in my opening statement,
8 the Italian courts are ready to adjudicate the
9 best interests of this child. They have a
10 hearing scheduled in June. They have appointed
11 an attorney for the child to represent the
12 child's interests. They have issued orders that
13 substantially protect the interests of this
14 child and reduce any risk to this child below
15 the threshold grave risk of harm.

16 CHIEF JUSTICE ROBERTS: Anything
17 further?

18 Thank you, counsel.

19 MR. MIN: Thank you.

20 CHIEF JUSTICE ROBERTS: Rebuttal, Ms.
21 King?

22 REBUTTAL ARGUMENT OF KAREN R. KING
23 ON BEHALF OF THE PETITIONER

24 MS. KING: Yes, thank you.

25 To start with the Italian proceeding,

1 all that's happened in Italy is more placeholder
2 dates, the same that's happened in the last
3 three years since that case was filed. The only
4 substantive action taken in the Italian
5 proceeding was the one that was put in place at
6 the request of this U.S. district court, going
7 through the parties and forcing the parties to
8 apply for a particular order.

9 I want to go back to the notion of an
10 exception. This is the fifth Hague case that
11 this Court has heard in 12 years, and in each of
12 its prior opinions, it identified the grave risk
13 exception as an example of where return is not
14 required because it is the plain reading of the
15 convention. There is no obligation to return,
16 no heavy thumb on the scale towards return, once
17 grave risk is proven.

18 And the exception exists for a reason.
19 And this is the first case where a mother has
20 proven the grave risk exception by the
21 exceedingly high evidentiary standard in this
22 country, by clear and convincing evidence.

23 And so, if we go back the three years
24 to March 22nd of 2019, when the district court
25 made that grave risk finding, I just want to

1 note that that finding was never even appealed.
2 It stands to this day, all of those findings of
3 horrific violence, of the character failings of
4 Mr. Saada, and of the harm, psychological and
5 physical harm, to the young child in this case.

6 But everything that followed from that
7 is infected by the Second Circuit's mandatory
8 requirement to exhaustively consider and try to
9 find a way to send the child back.

10 And Mr. Min says that ameliorative
11 measures was part of the trial, and that's not
12 exactly true. Although they were mentioned in
13 the trial, there was not a detailed factual
14 finding about ameliorative measures. It came up
15 after -- or in the middle of closing arguments.
16 At the end of closing arguments is when the
17 district court said, oh, by the way, can you
18 please propose some ameliorative measures?

19 And, at that time, the ameliorative
20 measures proposed by Mr. Saada were a bunch of
21 promises essentially. And even the Second
22 Circuit agrees that those promises are not
23 reliable, are not consistent with the
24 convention's requirement to try and protect the
25 children.

1 And, at the end of the day, the Second
2 Circuit's rule then required a -- another bite
3 at the apple, so to speak, and forced the
4 district court then to engage in this
5 nine-and-a-half-month process that I think we
6 can all recognize as being improper under the
7 convention's requirements.

8 The procedural and substantive defects
9 with that ultimate process are -- are too
10 ingrained for us to send this back. If the
11 defect is it took too long, the remedy shouldn't
12 be, well, give them more time to try again.

13 If the defect is the district court
14 should not have entangled itself with custody
15 matters, the remedy should not be to accept that
16 protective order now and allow the parties to
17 engage with it.

18 Because there's a safe and swift
19 resolution, we -- we urge a reversal.

20 CHIEF JUSTICE ROBERTS: Thank you,
21 counsel. The case is submitted.

22 (Whereupon, at 11:21 a.m., the case
23 was submitted.)

24
25

Official

1	19 43:21,21 46:19 58:6 60:23 61:1 67:24 68:21 75:1, 2 76:8 78:15 abusing [2] 37:20 76:9 accept [2] 79:19 83:15 acceptable [3] 28:19 34:20 35:9 accessible [6] 65:21 68:13, 18 69:5 70:25 78:17 accordance [1] 44:20 according [1] 48:7 Accordingly [1] 30:8 account [4] 7:11,15 46:10 57:5 acknowledge [4] 8:16 10:11 17:19 72:10 acknowledged [2] 40:21 54:7 acknowledgment [1] 70:13 across [1] 57:12 act [3] 13:19 45:9,10 action [1] 81:4 actually [1] 79:23 add [1] 53:25 added [2] 36:21 61:18 adding [1] 61:7 additional [2] 31:25 60:24 address [4] 8:17 9:5 20:10 59:16 addressed [1] 58:20 addressing [1] 48:15 adds [1] 79:8 adduced [1] 73:21 adequate [1] 61:1 adjudicate [1] 80:8 adjudicating [1] 58:2 adjudication [4] 32:5 52:7 59:24 73:7 adopted [4] 5:8 14:12,14 54:14 adopts [1] 20:14 adversarial [2] 15:24 69:16 advised [1] 29:5 affect [1] 62:2 affirm [2] 59:25 80:6 affirmed [1] 71:19 Afghanistan [2] 64:16 65:7 afraid [1] 63:19 ago [3] 5:12 26:24 37:2 agree [18] 13:15 15:15,16 23:11 29:8 32:25 35:18 40:22 47:3 52:12 62:8,18 64:10 66:23 68:14 70:6,24 78:11 agreed [1] 71:22 agreement [1] 7:10 agrees [2] 5:9 82:22 ahead [2] 14:22 64:20 ALITO [34] 14:19,22 18:5, 14,22 19:9,16,20 20:4,19 21:5,11 22:5,12,15,24 23:2,	16 39:23 40:19,23 41:4,11, 14,21 42:2 43:9,20 44:1 46:15 47:24 49:18 55:18 62:15 Alito's [1] 37:14 ALIZA [1] 1:3 allegations [4] 57:3 76:23, 25 77:5 allow [4] 34:15 58:5 75:18 83:16 allowed [1] 5:14 allowing [1] 46:23 alluded [1] 28:13 almost [6] 6:5 28:16,18 52:15 53:16 61:7 alone [2] 24:4,7 already [7] 21:25 26:9 36:22 42:6 51:20,24 59:13 although [3] 39:11 47:3 82:12 altogether [1] 74:25 ameliorating [1] 35:11 ameliorative [92] 4:22 6:12,21,24 7:10,19 8:10,13, 19 9:4,21 10:9,14 11:6,22 12:1,2 13:7,21 15:22 16:7 21:17,23 23:5 25:24 26:1 27:16 28:18 29:19 30:2 31:6,20,21 33:10 35:4,20 36:7, 18 37:18 38:7 41:7,17 42:8 45:20 47:5 49:13,15,24 50:3,7,14 51:1,14 52:5,14 53:9 54:9 56:1,20 57:8 58:1 60:5 61:6,17 62:17 65:3, 16,22 67:1 68:13 69:6 71:12,17,18,21 72:15,20,23 73:21,24 74:7 76:21 77:1 78:18 79:14,18,19 80:1 82:10,14,18,19 America [1] 50:12 amicus [7] 2:7 3:7 29:14 60:20 63:12,13 73:1 ample [1] 39:4 analogy [1] 66:5 analysis [16] 8:18,19,20 9:20 31:5 40:14 60:15 62:9 66:20 71:8 72:19,23 73:6, 10 76:25 77:4 analytically [1] 47:5 analyze [1] 35:1 announced [1] 46:21 another [10] 36:17,17 47:8 49:2,25 51:3,5 55:22 61:14 83:2 answer [6] 13:11 18:24 43:10 45:24 55:5 64:21 anticipated [1] 44:17 antithetical [1] 20:1 appeal [5] 35:19 38:25 46:23 60:20 71:14 appealed [1] 82:1 appeals [5] 32:23 33:22 43:13 46:24 55:18 APPEARANCES [1] 2:1	appellate [2] 42:20 43:6 Appendix [2] 31:8 38:22 apple [3] 24:16 33:10 83:3 applicable [1] 42:18 application [1] 65:19 applied [1] 71:4 applies [1] 45:5 apply [3] 22:2 70:1 81:8 applying [1] 42:17 appointed [1] 80:10 appreciate [1] 54:22 approach [4] 58:10 60:18 64:6 68:2 appropriate [21] 13:17 21:8 22:9,18 32:25 33:2 34:23 38:12 39:10,22 48:20 50:18 51:17 52:15 56:20 57:9 62:24 66:20 68:15 78:3,9 appropriately [1] 23:6 argument [12] 1:14 3:2,5,9, 12 4:8,11 20:5 29:13 57:21 66:12 80:22 arguments [4] 4:7 44:10 82:15,16 around [2] 67:1 70:1 Article [5] 18:9 19:20 29:21 60:13 62:12 articulated [2] 11:3 31:8 assessed [1] 54:10 assist [1] 79:9 assistance [1] 79:2 Assistant [1] 2:5 Assume [2] 15:1 16:4 assumption [1] 76:6 attacked [1] 11:11 attempted [1] 74:15 attention [1] 25:9 attorney [1] 80:11 authenticated [1] 75:20 authorities [1] 46:12 authority [3] 40:17 45:17 67:11 available [12] 24:12 65:16, 22 66:9,18 67:19 68:13,16 69:6 70:25 71:21 78:17 avoid [1] 52:18 avoiding [1] 52:7 avoids [1] 48:22 away [5] 16:8 24:22 38:4 41:18 69:4 awry [1] 44:22	5 bad [3] 46:2 56:8 62:1 balance [1] 24:11 balancing [2] 19:8 63:4 Barrett [12] 27:2,3,14 28:2, 14,24 29:1,9 54:25 55:1 57:15 64:4 based [3] 16:22 20:6,7 basic [1] 44:7 basically [2] 12:19 19:17 basis [3] 4:6 29:22 60:6 beat [1] 11:10 become [1] 18:18 began [1] 11:3 behalf [8] 2:3,9 3:4,11,14 4:12 57:22 80:23 behavior [2] 38:24 63:6 behind [1] 71:25 believe [16] 43:16 60:11 62:11 63:16 65:9 66:6 67:22 68:10 70:9 74:6 75:21 76:18 78:10,15 79:7,9 believes [1] 65:18 belong [1] 64:1 belongs [2] 43:3 76:15 below [5] 12:22 17:7 29:4 37:4 80:14 bench [1] 32:20 best [7] 5:10 32:9 51:17 59:7,20 64:5 80:9 better [2] 11:7 37:22 between [4] 42:14 58:9,22 65:2 beyond [2] 72:5,11 big [1] 42:13 bit [1] 49:10 bite [2] 24:16 83:2 bites [1] 33:10 Blondin [5] 60:19,22 63:12, 13 73:1 board [1] 42:3 bombed [1] 65:10 bombing [1] 64:16 bond [1] 11:14 borrowing [1] 48:1 both [3] 8:17 39:12 57:12 bother [1] 16:9 bound [3] 4:16 18:10 34:5 box [1] 55:7 BREYER [20] 9:12 10:23 11:1 12:9,13,18,24 13:7,11, 23 14:1,9 23:15 24:18 26:7 46:5 47:23 63:19 64:23 77:11 brief [8] 44:6 52:14 60:21 63:12,13 67:17 68:24 73:1 briefly [2] 9:14 23:20 briefs [1] 4:6 broad [1] 48:21 Brussels [1] 14:13 buckets [1] 51:16 built [3] 58:8 63:14 70:12 bunch [1] 82:20 burden [2] 10:4 74:10		
2	20-1034 [1] 4:9 2019 [2] 79:24 81:24 2020 [1] 77:23 2022 [1] 1:11 21 [1] 60:20 22 [1] 1:11 22nd [1] 81:24 29 [1] 3:8 2A [1] 14:13	19 43:21,21 46:19 58:6 60:23 61:1 67:24 68:21 75:1, 2 76:8 78:15 abusing [2] 37:20 76:9 accept [2] 79:19 83:15 acceptable [3] 28:19 34:20 35:9 accessible [6] 65:21 68:13, 18 69:5 70:25 78:17 accordance [1] 44:20 according [1] 48:7 Accordingly [1] 30:8 account [4] 7:11,15 46:10 57:5 acknowledge [4] 8:16 10:11 17:19 72:10 acknowledged [2] 40:21 54:7 acknowledgment [1] 70:13 across [1] 57:12 act [3] 13:19 45:9,10 action [1] 81:4 actually [1] 79:23 add [1] 53:25 added [2] 36:21 61:18 adding [1] 61:7 additional [2] 31:25 60:24 address [4] 8:17 9:5 20:10 59:16 addressed [1] 58:20 addressing [1] 48:15 adds [1] 79:8 adduced [1] 73:21 adequate [1] 61:1 adjudicate [1] 80:8 adjudicating [1] 58:2 adjudication [4] 32:5 52:7 59:24 73:7 adopted [4] 5:8 14:12,14 54:14 adopts [1] 20:14 adversarial [2] 15:24 69:16 advised [1] 29:5 affect [1] 62:2 affirm [2] 59:25 80:6 affirmed [1] 71:19 Afghanistan [2] 64:16 65:7 afraid [1] 63:19 ago [3] 5:12 26:24 37:2 agree [18] 13:15 15:15,16 23:11 29:8 32:25 35:18 40:22 47:3 52:12 62:8,18 64:10 66:23 68:14 70:6,24 78:11 agreed [1] 71:22 agreement [1] 7:10 agrees [2] 5:9 82:22 ahead [2] 14:22 64:20 ALITO [34] 14:19,22 18:5, 14,22 19:9,16,20 20:4,19 21:5,11 22:5,12,15,24 23:2,	8 57 [1] 3:11 80 [1] 3:14 80a [1] 38:22 81a [1] 31:8 9 9 [1] 77:23 90 [1] 71:25 A a.m [3] 1:15 4:2 83:22 Abbott [1] 59:17 abducted [4] 56:24 57:1 58:13 65:6 abducting [6] 62:24 63:6 66:7 74:10 76:23 78:24 abduction [2] 58:3 77:24 abductions [2] 58:25 63:5 abductor [1] 78:22 abide [1] 52:6 ability [1] 59:18 able [4] 10:3 22:3 47:20 54:9 above-entitled [1] 1:13 abroad [3] 57:5 58:13 63:18 absent [1] 62:19 absolute [1] 64:20 Absolutely [1] 35:17 abuse [33] 5:19 6:16 7:3 14:25 18:19,23 19:1,14 20:2 21:3 22:15 27:5,9,24 28:11,13,17 38:14 42:11,14,	5 bad [3] 46:2 56:8 62:1 balance [1] 24:11 balancing [2] 19:8 63:4 Barrett [12] 27:2,3,14 28:2, 14,24 29:1,9 54:25 55:1 57:15 64:4 based [3] 16:22 20:6,7 basic [1] 44:7 basically [2] 12:19 19:17 basis [3] 4:6 29:22 60:6 beat [1] 11:10 become [1] 18:18 began [1] 11:3 behalf [8] 2:3,9 3:4,11,14 4:12 57:22 80:23 behavior [2] 38:24 63:6 behind [1] 71:25 believe [16] 43:16 60:11 62:11 63:16 65:9 66:6 67:22 68:10 70:9 74:6 75:21 76:18 78:10,15 79:7,9 believes [1] 65:18 belong [1] 64:1 belongs [2] 43:3 76:15 below [5] 12:22 17:7 29:4 37:4 80:14 bench [1] 32:20 best [7] 5:10 32:9 51:17 59:7,20 64:5 80:9 better [2] 11:7 37:22 between [4] 42:14 58:9,22 65:2 beyond [2] 72:5,11 big [1] 42:13 bit [1] 49:10 bite [2] 24:16 83:2 bites [1] 33:10 Blondin [5] 60:19,22 63:12, 13 73:1 board [1] 42:3 bombed [1] 65:10 bombing [1] 64:16 bond [1] 11:14 borrowing [1] 48:1 both [3] 8:17 39:12 57:12 bother [1] 16:9 bound [3] 4:16 18:10 34:5 box [1] 55:7 BREYER [20] 9:12 10:23 11:1 12:9,13,18,24 13:7,11, 23 14:1,9 23:15 24:18 26:7 46:5 47:23 63:19 64:23 77:11 brief [8] 44:6 52:14 60:21 63:12,13 67:17 68:24 73:1 briefly [2] 9:14 23:20 briefs [1] 4:6 broad [1] 48:21 Brussels [1] 14:13 buckets [1] 51:16 built [3] 58:8 63:14 70:12 bunch [1] 82:20 burden [2] 10:4 74:10		
4	4 [1] 3:4	16 39:23 40:19,23 41:4,11, 14,21 42:2 43:9,20 44:1 46:15 47:24 49:18 55:18 62:15 Alito's [1] 37:14 ALIZA [1] 1:3 allegations [4] 57:3 76:23, 25 77:5 allow [4] 34:15 58:5 75:18 83:16 allowed [1] 5:14 allowing [1] 46:23 alluded [1] 28:13 almost [6] 6:5 28:16,18 52:15 53:16 61:7 alone [2] 24:4,7 already [7] 21:25 26:9 36:22 42:6 51:20,24 59:13 although [3] 39:11 47:3 82:12 altogether [1] 74:25 ameliorating [1] 35:11 ameliorative [92] 4:22 6:12,21,24 7:10,19 8:10,13, 19 9:4,21 10:9,14 11:6,22 12:1,2 13:7,21 15:22 16:7 21:17,23 23:5 25:24 26:1 27:16 28:18 29:19 30:2 31:6,20,21 33:10 35:4,20 36:7, 18 37:18 38:7 41:7,17 42:8 45:20 47:5 49:13,15,24 50:3,7,14 51:1,14 52:5,14 53:9 54:9 56:1,20 57:8 58:1 60:5 61:6,17 62:17 65:3, 16,22 67:1 68:13 69:6 71:12,17,18,21 72:15,20,23 73:21,24 74:7 76:21 77:1 78:18 79:14,18,19 80:1 82:10,14,18,19 America [1] 50:12 amicus [7] 2:7 3:7 29:14 60:20 63:12,13 73:1 ample [1] 39:4 analogy [1] 66:5 analysis [16] 8:18,19,20 9:20 31:5 40:14 60:15 62:9 66:20 71:8 72:19,23 73:6, 10 76:25 77:4 analytically [1] 47:5 analyze [1] 35:1 announced [1] 46:21 another [10] 36:17,17 47:8 49:2,25 51:3,5 55:22 61:14 83:2 answer [6] 13:11 18:24 43:10 45:24 55:5 64:21 anticipated [1] 44:17 antithetical [1] 20:1 appeal [5] 35:19 38:25 46:23 60:20 71:14 appealed [1] 82:1 appeals [5] 32:23 33:22 43:13 46:24 55:18 APPEARANCES [1] 2:1	4 4 [1] 3:4	4 4 [1] 3:4	5 57 [1] 3:11 80 [1] 3:14 80a [1] 38:22 81a [1] 31:8 9 9 [1] 77:23 90 [1] 71:25 A a.m [3] 1:15 4:2 83:22 Abbott [1] 59:17 abducted [4] 56:24 57:1 58:13 65:6 abducting [6] 62:24 63:6 66:7 74:10 76:23 78:24 abduction [2] 58:3 77:24 abductions [2] 58:25 63:5 abductor [1] 78:22 abide [1] 52:6 ability [1] 59:18 able [4] 10:3 22:3 47:20 54:9 above-entitled [1] 1:13 abroad [3] 57:5 58:13 63:18 absent [1] 62:19 absolute [1] 64:20 Absolutely [1] 35:17 abuse [33] 5:19 6:16 7:3 14:25 18:19,23 19:1,14 20:2 21:3 22:15 27:5,9,24 28:11,13,17 38:14 42:11,14,	5 bad [3] 46:2 56:8 62:1 balance [1] 24:11 balancing [2] 19:8 63:4 Barrett [12] 27:2,3,14 28:2, 14,24 29:1,9 54:25 55:1 57:15 64:4 based [3] 16:22 20:6,7 basic [1] 44:7 basically [2] 12:19 19:17 basis [3] 4:6 29:22 60:6 beat [1] 11:10 become [1] 18:18 began [1] 11:3 behalf [8] 2:3,9 3:4,11,14 4:12 57:22 80:23 behavior [2] 38:24 63:6 behind [1] 71:25 believe [16] 43:16 60:11 62:11 63:16 65:9 66:6 67:22 68:10 70:9 74:6 75:21 76:18 78:10,15 79:7,9 believes [1] 65:18 belong [1] 64:1 belongs [2] 43:3 76:15 below [5] 12:22 17:7 29:4 37:4 80:14 bench [1] 32:20 best [7] 5:10 32:9 51:17 59:7,20 64:5 80:9 better [2] 11:7 37:22 between [4] 42:14 58:9,22 65:2 beyond [2] 72:5,11 big [1] 42:13 bit [1] 49:10 bite [2] 24:16 83:2 bites [1] 33:10 Blondin [5] 60:19,22 63:12, 13 73:1 board [1] 42:3 bombed [1] 65:10 bombing [1] 64:16 bond [1] 11:14 borrowing [1] 48:1 both [3] 8:17 39:12 57:12 bother [1] 16:9 bound [3] 4:16 18:10 34:5 box [1] 55:7 BREYER [20] 9:12 10:23 11:1 12:9,13,18,24 13:7,11, 23 14:1,9 23:15 24:18 26:7 46:5 47:23 63:19 64:23 77:11 brief [8] 44:6 52:14 60:21 63:12,13 67:17 68:24 73:1 briefly [2] 9:14 23:20 briefs [1] 4:6 broad [1] 48:21 Brussels [1] 14:13 buckets [1] 51:16 built [3] 58:8 63:14 70:12 bunch [1] 82:20 burden [2] 10:4 74:10
A	19 43:21,21 46:19 58:6 60:23 61:1 67:24 68:21 75:1, 2 76:8 78:15 abusing [2] 37:20 76:9 accept [2] 79:19 83:15 acceptable [3] 28:19 34:20 35:9 accessible [6] 65:21 68:13, 18 69:5 70:25 78:17 accordance [1] 44:20 according [1] 48:7 Accordingly [1] 30:8 account [4] 7:11,15 46:10 57:5 acknowledge [4] 8:16 10:11 17:19 72:10 acknowledged [2] 40:21 54:7 acknowledgment [1] 70:13 across [1] 57:12 act [3] 13:19 45:9,10 action [1] 81:4 actually [1] 79:23 add [1] 53:25 added [2] 36:21 61:18 adding [1] 61:7 additional [2] 31:25 60:24 address [4] 8:17 9:5 20:10 59:16 addressed [1] 58:20 addressing [1] 48:15 adds [1] 79:8 adduced [1] 73:21 adequate [1] 61:1 adjudicate [1] 80:8 adjudicating [1] 58:2 adjudication [4] 32:5 52:7 59:24 73:7 adopted [4] 5:8 14:12,14 54:14 adopts [1] 20:14 adversarial [2] 15:24 69:16 advised [1] 29:5 affect [1] 62:2 affirm [2] 59:25 80:6 affirmed [1] 71:19 Afghanistan [2] 64:16 65:7 afraid [1] 63:19 ago [3] 5:12 26:24 37:2 agree [18] 13:15 15:15,16 23:11 29:8 32:25 35:18 40:22 47:3 52:12 62:8,18 64:10 66:23 68:14 70:6,24 78:11 agreed [1] 71:22 agreement [

Official

<p>burdensome ^[1] 13:22 Bureau ^[1] 77:25 bureaus ^[1] 63:22</p>	<p>31:23 32:16 45:1,19 47:22 49:7 52:10 54:4,24 57:17, 20,23 60:4 61:5 71:24 72: 9 80:16,20 83:20</p>	<p>competing ^[1] 21:21 completely ^[1] 42:2 complex ^[3] 5:16 56:5 58: 3</p>	<p>20 contrast ^[2] 33:14 50:23 control ^[1] 28:10 Convention ^[56] 4:15 5:1</p>	<p>13 63:3,24 64:8 65:5,20 66:10 68:4 69:4,7 71:1,10, 20 72:18 74:7,17,25 75:6, 13,24 76:13,15,16 77:21</p>
<p style="text-align: center;">C</p>	<p>child ^[87] 4:16,18,22 5:4,14 6:5 8:23 11:9,11 15:4,7,8, 10 17:12,13,20 18:11,16</p>	<p>complexity ^[1] 27:21 complicated ^[3] 26:19 28: 4 29:7</p>	<p>6:2,22,23 7:2 8:21 14:12, 14,17 15:2,8,17 17:14,18 19:22 20:2,6,9 21:22,25</p>	<p>78:16,23 79:3 80:4,6 81:6, 11,24 82:17 83:4,13 Court's ^[9] 6:9 26:7 30:13</p>
<p>called ^[4] 11:22 47:17 73: 15,18 came ^[3] 1:13 35:14 82:14 camera ^[1] 47:19 candle ^[1] 51:13 cannot ^[7] 22:1 23:10 36: 23 40:11 66:14,15 74:18</p>	<p>child ^[87] 4:16,18,22 5:4,14 6:5 8:23 11:9,11 15:4,7,8, 10 17:12,13,20 18:11,16</p>	<p>comply ^[2] 39:5,13 concede ^[1] 79:18 concept ^[4] 13:18 16:20 60:8 61:7</p>	<p>22:20 24:8,14 25:25 29:22, 24 30:1,5,21 32:3,5 39:18 40:8,14 42:11 43:1 44:19, 20 45:8 52:7 56:13 58:8</p>	<p>31:5 35:3 42:8,9 50:20 71: 7</p>
<p>capable ^[3] 47:16 63:25 74: 12 capacity ^[1] 38:23 care ^[2] 16:10 74:24 cares ^[1] 32:6 carry ^[1] 59:19</p>	<p>19:6,24 20:16,23 21:18 23: 3,9 24:8,12,21,22,24,25 25: 4 26:5,8,12,14,17,22 31:15</p>	<p>concern ^[3] 31:24 32:16 51:22 concerns ^[5] 51:24 53:21 56:13 61:25 79:17</p>	<p>59:5 60:6,8,13 62:12 63: 16 69:23 70:2,12 74:1 77: 24 78:14 81:15</p>	<p>courts ^[49] 4:21 12:15 14:4, 5,6 20:11 25:10,11,12,22</p>
<p>case ^[62] 4:6,9 5:10,17 7: 13,19 10:21 20:12 23:22 26:9,21,23,25 27:15 28:3 29:20 30:7 31:6 33:2 34: 16,18 36:13 39:19 44:6 46: 10 48:3 56:2 57:6,9 58:17, 20 64:1 65:4,14 66:3,5,6,6</p>	<p>32:9 37:17 38:8 39:14 40: 2,4,7,17 41:6 44:13 47:18 48:10 49:19 51:6 57:14 58: 21 59:2,14 60:16 61:4 62: 1,13,18,19,20 63:3,8,9 64: 15 65:6,8 66:14,16 71:22</p>	<p>conclude ^[4] 38:11 39:9 51:12 74:17 concluded ^[1] 39:3 conclusion ^[2] 33:2 49:15</p>	<p>convention's ^[6] 5:2 22: 21 31:15 57:25 82:24 83:7 convention-specific ^[1] 42:24</p>	<p>26:17,18 29:4,18 30:3,9 41:23 42:22 43:2,6,7 44: 17,18 45:9 46:8,23 47:3,14, 20 52:4 55:8 56:11 58:13</p>
<p>cases ^[55] 10:3,11 20:18 22:2 26:8,13 27:4,7,12,24 28:17 40:6,20,21 43:14 44: 8,19,19 45:6,23 47:14,21 50:24 51:15 52:20,23 53:2, 5,6,19,20,21 54:8,18,21 56: 6,15,18 57:4 58:3 64:12</p>	<p>74:18 75:12 77:2,23 78:19 79:4,10 80:2,9,11,14,14 82: 5,9 child's ^[5] 19:23 24:13 46: 3 59:24 80:12</p>	<p>condition ^[1] 7:10 conditions ^[10] 21:17 23:6 39:5 45:20 53:7 60:5 61:6, 16,18 67:4</p>	<p>convincing ^[6] 10:7 19:5, 25 26:11 27:11 81:22 cooperate ^[1] 63:7 cooperation ^[1] 63:15</p>	<p>59:13 63:16 67:18 68:12 69:25,25 70:1,5,7,15,16 72: 7 74:5,11 77:16 80:8</p>
<p>cases ^[55] 10:3,11 20:18 22:2 26:8,13 27:4,7,12,24 28:17 40:6,20,21 43:14 44: 8,19,19 45:6,23 47:14,21 50:24 51:15 52:20,23 53:2, 5,6,19,20,21 54:8,18,21 56: 6,15,18 57:4 58:3 64:12</p>	<p>chooses ^[1] 20:8 chose ^[1] 6:17 Circuit ^[33] 5:21 13:3 15:20 16:5 21:15,22 24:6 25:5, 16 29:18 35:18,24 36:9,11</p>	<p>confer ^[4] 58:11 68: 11 77:8,25 confident ^[1] 41:2 confused ^[2] 12:6 49:10</p>	<p>correct ^[7] 6:14 11:23 18: 13 27:3 34:11 44:5 50:6 costs ^[2] 17:25 32:4 Counsel ^[10] 14:18,23 29: 11 32:15 57:18 71:24 74: 22 76:3 80:18 83:21</p>	<p>created ^[1] 73:23 creating ^[2] 61:6 62:25 criticize ^[1] 73:1 criticized ^[2] 73:16,16</p>
<p>cases ^[55] 10:3,11 20:18 22:2 26:8,13 27:4,7,12,24 28:17 40:6,20,21 43:14 44: 8,19,19 45:6,23 47:14,21 50:24 51:15 52:20,23 53:2, 5,6,19,20,21 54:8,18,21 56: 6,15,18 57:4 58:3 64:12</p>	<p>children ^[16] 17:16 23:12 32:6 56:23 57:1 58:5,13 59:1,6,20 63:17 70:11,15 74:2,13 82:25</p>	<p>conclusion ^[2] 33:2 49:15 condition ^[1] 7:10 conditions ^[10] 21:17 23:6 39:5 45:20 53:7 60:5 61:6, 16,18 67:4</p>	<p>cooperate ^[1] 63:7 cooperation ^[1] 63:15 core ^[1] 59:5 correct ^[7] 6:14 11:23 18: 13 27:3 34:11 44:5 50:6</p>	<p>crossed ^[1] 42:16 crosses ^[1] 42:24 curiae ^[3] 2:7 3:8 29:14 current ^[1] 24:1</p>
<p>cases ^[55] 10:3,11 20:18 22:2 26:8,13 27:4,7,12,24 28:17 40:6,20,21 43:14 44: 8,19,19 45:6,23 47:14,21 50:24 51:15 52:20,23 53:2, 5,6,19,20,21 54:8,18,21 56: 6,15,18 57:4 58:3 64:12</p>	<p>children ^[16] 17:16 23:12 32:6 56:23 57:1 58:5,13 59:1,6,20 63:17 70:11,15 74:2,13 82:25</p>	<p>confer ^[4] 58:11 68: 11 77:8,25 confident ^[1] 41:2 confused ^[2] 12:6 49:10</p>	<p>costs ^[2] 17:25 32:4 Counsel ^[10] 14:18,23 29: 11 32:15 57:18 71:24 74: 22 76:3 80:18 83:21</p>	<p>custody ^[22] 5:5,15,22 7:1 23:8 26:3,17,23 41:24 51: 6 53:12 54:3 59:3,7,8,11, 16,23 70:14 75:6 76:15 83: 14</p>
<p>cases ^[55] 10:3,11 20:18 22:2 26:8,13 27:4,7,12,24 28:17 40:6,20,21 43:14 44: 8,19,19 45:6,23 47:14,21 50:24 51:15 52:20,23 53:2, 5,6,19,20,21 54:8,18,21 56: 6,15,18 57:4 58:3 64:12</p>	<p>children ^[16] 17:16 23:12 32:6 56:23 57:1 58:5,13 59:1,6,20 63:17 70:11,15 74:2,13 82:25</p>	<p>connected ^[1] 66:13 consider ^[38] 6:12,21 7:19, 23,24 9:3,4 12:4,5 29:19</p>	<p>country ^[33] 11:9 19:11,12 20:23 21:18 23:9 24:25 28: 9 29:23 40:3,7,24 43:2 51: 7 58:6 59:4,8 63:1 64:18</p>	<p>cut ^[1] 7:5</p>
<p>cases ^[55] 10:3,11 20:18 22:2 26:8,13 27:4,7,12,24 28:17 40:6,20,21 43:14 44: 8,19,19 45:6,23 47:14,21 50:24 51:15 52:20,23 53:2, 5,6,19,20,21 54:8,18,21 56: 6,15,18 57:4 58:3 64:12</p>	<p>children ^[16] 17:16 23:12 32:6 56:23 57:1 58:5,13 59:1,6,20 63:17 70:11,15 74:2,13 82:25</p>	<p>consider ^[38] 6:12,21 7:19, 23,24 9:3,4 12:4,5 29:19</p>	<p>country ^[33] 11:9 19:11,12 20:23 21:18 23:9 24:25 28: 9 29:23 40:3,7,24 43:2 51: 7 58:6 59:4,8 63:1 64:18</p>	<p style="text-align: center;">D</p>
<p>cases ^[55] 10:3,11 20:18 22:2 26:8,13 27:4,7,12,24 28:17 40:6,20,21 43:14 44: 8,19,19 45:6,23 47:14,21 50:24 51:15 52:20,23 53:2, 5,6,19,20,21 54:8,18,21 56: 6,15,18 57:4 58:3 64:12</p>	<p>children ^[16] 17:16 23:12 32:6 56:23 57:1 58:5,13 59:1,6,20 63:17 70:11,15 74:2,13 82:25</p>	<p>consider ^[38] 6:12,21 7:19, 23,24 9:3,4 12:4,5 29:19</p>	<p>country ^[33] 11:9 19:11,12 20:23 21:18 23:9 24:25 28: 9 29:23 40:3,7,24 43:2 51: 7 58:6 59:4,8 63:1 64:18</p>	<p>D.C ^[2] 1:10 2:6 damaging ^[1] 24:7 damned ^[1] 25:1</p>
<p>cases ^[55] 10:3,11 20:18 22:2 26:8,13 27:4,7,12,24 28:17 40:6,20,21 43:14 44: 8,19,19 45:6,23 47:14,21 50:24 51:15 52:20,23 53:2, 5,6,19,20,21 54:8,18,21 56: 6,15,18 57:4 58:3 64:12</p>	<p>children ^[16] 17:16 23:12 32:6 56:23 57:1 58:5,13 59:1,6,20 63:17 70:11,15 74:2,13 82:25</p>	<p>consider ^[38] 6:12,21 7:19, 23,24 9:3,4 12:4,5 29:19</p>	<p>country ^[33] 11:9 19:11,12 20:23 21:18 23:9 24:25 28: 9 29:23 40:3,7,24 43:2 51: 7 58:6 59:4,8 63:1 64:18</p>	<p>danger ^[3] 15:7,10,14 date ^[1] 38:23 dates ^[1] 81:2</p>
<p>cases ^[55] 10:3,11 20:18 22:2 26:8,13 27:4,7,12,24 28:17 40:6,20,21 43:14 44: 8,19,19 45:6,23 47:14,21 50:24 51:15 52:20,23 53:2, 5,6,19,20,21 54:8,18,21 56: 6,15,18 57:4 58:3 64:12</p>	<p>children ^[16] 17:16 23:12 32:6 56:23 57:1 58:5,13 59:1,6,20 63:17 70:11,15 74:2,13 82:25</p>	<p>consider ^[38] 6:12,21 7:19, 23,24 9:3,4 12:4,5 29:19</p>	<p>country ^[33] 11:9 19:11,12 20:23 21:18 23:9 24:25 28: 9 29:23 40:3,7,24 43:2 51: 7 58:6 59:4,8 63:1 64:18</p>	<p>Davies ^[1] 71:9 day ^[2] 82:2 83:1 days ^[2] 27:8 33:4</p>
<p>cases ^[55] 10:3,11 20:18 22:2 26:8,13 27:4,7,12,24 28:17 40:6,20,21 43:14 44: 8,19,19 45:6,23 47:14,21 50:24 51:15 52:20,23 53:2, 5,6,19,20,21 54:8,18,21 56: 6,15,18 57:4 58:3 64:12</p>	<p>children ^[16] 17:16 23:12 32:6 56:23 57:1 58:5,13 59:1,6,20 63:17 70:11,15 74:2,13 82:25</p>	<p>consider ^[38] 6:12,21 7:19, 23,24 9:3,4 12:4,5 29:19</p>	<p>country ^[33] 11:9 19:11,12 20:23 21:18 23:9 24:25 28: 9 29:23 40:3,7,24 43:2 51: 7 58:6 59:4,8 63:1 64:18</p>	<p>de ^[1] 46:25 deal ^[5] 5:16 14:7,8 25:19 26:18 debating ^[1] 62:4 December ^[1] 79:24</p>
<p>cases ^[55] 10:3,11 20:18 22:2 26:8,13 27:4,7,12,24 28:17 40:6,20,21 43:14 44: 8,19,19 45:6,23 47:14,21 50:24 51:15 52:20,23 53:2, 5,6,19,20,21 54:8,18,21 56: 6,15,18 57:4 58:3 64:12</p>	<p>children ^[16] 17:16 23:12 32:6 56:23 57:1 58:5,13 59:1,6,20 63:17 70:11,15 74:2,13 82:25</p>	<p>consider ^[38] 6:12,21 7:19, 23,24 9:3,4 12:4,5 29:19</p>	<p>country ^[33] 11:9 19:11,12 20:23 21:18 23:9 24:25 28: 9 29:23 40:3,7,24 43:2 51: 7 58:6 59:4,8 63:1 64:18</p>	<p>decide ^[6] 8:4,9 9:3 20:22 44:19 63:4 decides ^[1] 74:25 decision ^[6] 4:5 17:8 35: 10 45:14 75:6 79:6</p>

Official

<p>definitely [2] 17:20 21:2 delay [8] 9:24 16:19 22:3 30:16 31:25 51:22 73:23 79:25 delaying [1] 23:7 delays [2] 73:4,6 demonstrated [1] 26:10 demonstration [1] 19:10 denial [1] 31:13 denied [5] 35:4 36:1 71:11 74:16 79:13 deny [4] 25:23 34:19 36:12, 14 denying [1] 48:25 Department [3] 2:6 5:7 50: 17 Department's [1] 40:13 depend [1] 15:24 depends [3] 6:18 7:12 28: 22 depth [1] 72:10 describe [1] 72:3 described [1] 75:15 deserves [1] 6:8 designed [2] 23:2 30:21 desperately [1] 45:23 despite [3] 20:24 31:14 40: 3 detailed [2] 28:5 82:13 deter [2] 58:24 63:5 determination [6] 7:14 45: 21 49:12 54:1,2,4 determinations [2] 23:8 41:24 determine [2] 8:14 67:3 determined [2] 9:1 54:10 determining [4] 7:17 41: 23 43:18 61:13 detour [2] 5:21 26:22 develop [4] 21:16 22:10,19 45:5 developing [1] 55:19 difference [1] 42:13 differences [1] 57:7 different [8] 12:15 19:22 24:20 27:15 31:1 49:10,11 54:18 differently [1] 31:21 difficult [6] 26:19 28:6 53: 10 54:8 55:3 77:17 direct [1] 62:20 directing [1] 60:1 direction [1] 53:2 disagree [2] 67:15 69:13 disagrees [1] 68:24 discrete [1] 10:12 discretion [59] 6:16,20 7:3, 23,25 9:2 13:16 14:25 15: 11,17 16:13 17:1 18:19,23 19:2,14 20:3,22 21:3 22: 16 25:23 28:15 30:3,5,7,10 33:15 34:18,25 36:14 37: 12,15,20 38:6,15 39:17 40: 16 42:12,14,19 43:7,12,21,</p>	<p>22,24 46:20 50:13,20 55: 20,23 56:3,11 58:7 62:13, 15 67:24 68:21 78:11,16 discretionary [4] 26:1 39: 17 79:11,20 disfavored [1] 31:14 dispute [4] 22:7,8 52:9 59: 3 distinct [1] 47:5 distinction [2] 65:2 79:16 distorted [1] 31:4 district [76] 4:17 5:12,20 6: 11 9:2 13:16 15:11,21 16: 6 18:15 19:4 20:21 22:16 28:16 31:1,5,9,19 32:11,13, 19 33:17,20,23,25 34:2,13, 25 35:3,16 36:13,16 37:5, 24 38:1,5,11,13,20,20 39:8, 19,20 40:2 42:8 43:12 44: 2,2 45:9 46:8 47:2,9,14,20 48:3,5,11 49:2 50:12,20 54:14 55:8 56:11 68:4 70: 5 71:7,10,19 74:17 75:24 77:21 81:6,24 82:17 83:4, 13 doctrine [1] 60:5 documents [1] 75:19 doing [1] 44:17 domestic [22] 27:5,9,24 28: 3,17 52:16,19,23 53:2,5,19, 20 54:7 56:1,5,14,19 57:4 58:22 59:22 73:17 76:8 done [12] 20:9,11 21:6,15 22:22 35:25 36:11,15 41: 22 42:5 45:25 62:10 door [1] 27:17 doubt [2] 39:4 59:18 drafted [1] 71:3 draw [1] 50:23 dried [1] 7:5 dump [3] 7:8 9:18 41:19 during [2] 72:15 74:9 duty [2] 59:19 69:7</p> <p style="text-align:center">E</p> <p>each [3] 55:18 57:6 81:11 earlier [1] 62:16 easily [3] 65:22 69:5 79:3 easy [3] 7:21,21,23 education [1] 62:3 effect [3] 35:11 50:8 77:9 effective [1] 26:5 effectiveness [1] 5:24 efficacy [1] 70:17 efforts [2] 6:12 63:7 Eidem [1] 66:6 either [4] 11:10 36:12 74:8, 15 elaborate [1] 72:5 elements [2] 28:10 47:11 eliminate [1] 15:14 emotional [1] 28:12 emphasize [1] 5:3 empowered [1] 43:6</p>	<p>enacted [3] 30:4 42:21 43: 4 encourage [1] 52:3 end [5] 22:2 24:15 26:25 82: 16 83:1 ended [2] 13:5 26:23 enforceable [3] 13:1 26:4 72:21 engage [4] 36:16 66:19 83: 4,17 engaged [1] 72:18 enough [3] 6:4 16:19 75: 12 ensure [1] 53:11 ensures [1] 58:11 ensuring [1] 59:2 entangle [2] 10:20 26:3 entangled [4] 5:5,22 6:3 83:14 entangles [1] 6:25 entered [1] 35:7 entertain [1] 60:3 entire [3] 13:18 22:9 65:10 entirely [4] 9:20 22:9,18 32: 24 entrust [1] 43:2 entrusted [1] 42:9 equally [1] 40:9 Ermini [2] 66:5,6 erroneous [1] 48:6 error [2] 52:25 55:12 especially [1] 76:8 ESQ [4] 3:3,6,10,13 ESQUIRE [2] 2:3,9 essentially [2] 31:13 82:21 EU [4] 14:3,3,12 77:15 evaluate [4] 31:20 32:9 58: 14 76:1 evaluation [1] 72:23 even [24] 9:4 10:1,8 13:18 15:22 16:18 23:5 25:2 32: 4 36:19 40:9,17,24 49:15 52:22 56:10,19 62:13 64:6 70:20 79:18,19 82:1,21 everybody [1] 45:22 everyone [1] 40:15 everything [2] 32:25 82:6 evidence [14] 7:15 10:7 16: 22 19:5,25 26:11 27:11 73: 20 74:7,14,19 75:20 76:22 81:22 evidence-gathering [1] 77:4 evidentiary [7] 10:4,16 17: 6 23:1 26:10 72:15 81:21 exactly [4] 10:22 11:2 14: 10 82:12 examination [1] 36:17 examine [1] 4:21 examines [1] 65:20 example [4] 65:11 66:3 77: 22 81:13 exceedingly [1] 81:21 exception [10] 4:17 10:6</p>	<p>17:23,23 58:15 73:14 81: 10,13,18,20 exceptions [1] 17:21 exercise [7] 21:23 33:15 34:18 36:13 43:23 51:18 55:19 exercised [1] 56:12 exercises [1] 44:12 exercising [1] 43:8 exhaustively [1] 82:8 exhibited [1] 38:23 exist [2] 8:22 36:18 existence [1] 17:22 exists [2] 7:18 81:18 expectations [1] 58:12 expedited [1] 10:24 28:7 29:7 expeditious [5] 5:3 17:18 26:2 47:21 75:18 expeditiously [4] 42:5 45: 10 47:21 75:7 experience [2] 73:5 74:23 expert [5] 11:5 25:18 73:2, 9,15 expertise [1] 26:18 experts [3] 73:18 74:19 77: 22 explain [2] 16:14 45:16 explanatory [1] 40:13 explored [1] 59:23 exposure [2] 8:24 58:22 extend [1] 62:6 extending [1] 61:10 extent [3] 72:22 75:11 76: 10 extraordinarily [1] 18:20 extraordinary [3] 19:13 49: 19,25 extreme [4] 16:5 55:24 76: 23 78:21 extremely [2] 9:7 28:3</p> <p style="text-align:center">F</p> <p>face [7] 32:10 34:19 35:4 40:18 44:14 48:17 76:25 facing [1] 24:22 fact [7] 20:24 22:7 33:8 49: 5 52:22 63:13 70:19 fact-intensive [1] 32:12 factor [1] 61:13 factored [1] 61:24 factors [2] 60:17 63:5 facts [3] 39:21 52:24 58:17 factual [1] 82:13 factually [1] 54:19 fail [1] 78:16 failed [1] 67:24 failings [1] 82:3 failure [4] 65:16 71:15,15, 17 fair [3] 40:23 53:18 54:13 fairly [2] 41:2 70:2 fall [1] 51:15 fallen [1] 55:13</p>	<p>falling [1] 55:12 falls [1] 17:5 familiar [1] 39:20 family [10] 5:16 14:5,6 25: 11 28:5 41:23 58:3,18 63: 24 64:8 far [8] 6:2,3 15:20 21:15 43: 10,11 72:4,11 fast [1] 45:25 father [1] 11:8 favor [1] 31:12 favorable [1] 33:15 Federal [1] 25:12 feel [1] 39:8 felt [1] 34:5 field [1] 78:5 fifth [1] 81:10 fight [1] 34:21 figure [4] 13:9 50:10 55:3 77:4 filed [1] 81:3 final [3] 49:14 54:2 79:6 financial [1] 27:21 find [7] 15:14 49:23 61:2,3 66:10 75:10 82:9 finding [24] 4:18 5:13 19: 24 25:22 29:20 33:23,25 34:19,24 40:4 48:17 49:20 60:23,25 62:14,21 63:10 75:9 76:7,14,16 81:25 82: 1,14 findings [1] 82:2 fine [3] 9:19 44:16 56:21 first [17] 8:4 11:25 15:13 24: 7 33:17,20 36:4,4,5,7 37: 19 38:9 39:2 67:17 73:13 75:23 81:19 five [2] 64:15,17 fix [1] 16:11 fleeting [3] 70:20 72:1,5 follow [2] 11:19 32:16 followed [2] 74:23 82:6 follows [1] 17:9 forced [3] 5:20,23 83:3 forcing [1] 81:7 foreign [6] 11:9,18 28:9 56: 24 63:16 73:11 forth [2] 71:20 76:22 forward [2] 26:20 56:15 found [1] 4:25 32:20 34: 13 35:5,19 37:16 38:21 39: 1 58:25 59:17,21 four [8] 4:25 45:13 50:24 51:15 66:24 67:11 68:7,25 fourth [1] 51:8 frame [1] 8:8 framed [1] 8:3 framework [3] 5:3 14:17 44:7 frankly [3] 38:19 39:9 55:8 FREDERICK [3] 2:5 3:6 29:13 free [2] 77:21 78:4 French [1] 71:11</p>
---	---	---	--	---

Official

<p>fresh ^[1] 37:5 front ^[1] 24:21 full ^[7] 4:21 13:20,20 29:19 36:17 65:17 71:16 fully ^[2] 59:23,23 fundamental ^[1] 68:1 fundamentally ^[1] 20:1 further ^[10] 23:15 27:2 30: 11 31:25 47:23 59:21 70: 23 72:18 80:5,17 future ^[4] 58:25 60:15 61:1 63:5</p>	<p>guidance ^[5] 55:9 56:10 58:14 75:23 77:22 guide ^[5] 50:19 55:19 68: 11 77:8,24 guided ^[2] 48:6 78:12</p>	<p style="text-align: center;">I</p> <p>ICARA ^[9] 10:5 20:13 21: 25 22:23 30:3 39:18 42:21 43:4 56:12 idea ^[2] 20:20 43:22 identified ^[2] 29:23 81:12 identify ^[1] 7:21 identifying ^[1] 8:21 II ^[2] 60:22 63:12 illuminating ^[1] 66:4 immediate ^[1] 60:1 implement ^[1] 30:4 implementation ^[5] 44:24 65:3 79:13,16,20 implemented ^[3] 30:4 65: 13 79:10 implementing ^[3] 5:1 42: 25 79:17 implements ^[1] 20:13 implications ^[3] 5:18 36: 24 37:3 implicit ^[1] 60:12 implying ^[1] 17:1 important ^[2] 18:2 79:16 impose ^[1] 61:16 imposed ^[1] 26:4 imposes ^[1] 29:25 imposing ^[1] 55:25 improper ^[1] 83:6 inappropriate ^[3] 34:10 43:13,24 inartfully ^[1] 71:3 included ^[1] 11:17 includes ^[2] 20:15 77:15 including ^[3] 5:17 36:18 60:16 incoming ^[1] 57:14 inconsistent ^[3] 6:2 7:2 24:8 incorrect ^[2] 4:19 17:13 indeed ^[3] 29:23 38:16 51: 17 indicated ^[1] 76:7 indications ^[1] 39:12 individual ^[1] 19:3 inevitable ^[1] 61:10 infected ^[1] 82:7 ingrained ^[1] 83:10 inherent ^[2] 60:12 70:12 initial ^[2] 35:3,19 initially ^[2] 32:19 38:21 inquiries ^[3] 9:10,15 47:7 inquiry ^[10] 8:3,12,17 32: 12 35:15 47:4,6 60:14 62: 7 66:13 inquisitorial ^[1] 69:15 insisted ^[1] 15:8 instances ^[2] 51:11 52:3 instantaneous ^[1] 65:5 instead ^[3] 15:10 30:1 45: 13 instinct ^[3] 25:8 26:7,14 insufficient ^[4] 35:6,20 36:</p>	<p>10 39:2 intent ^[1] 15:3 interchangeably ^[1] 12:16 interest ^[3] 17:17 19:24 59: 20 interests ^[8] 17:16 19:22 24:13 59:2,6 80:9,12,13 interim ^[2] 5:15 26:16 international ^[5] 69:20,25 70:6 72:6,7 internationally ^[1] 69:23 interpret ^[1] 20:8 interpretation ^[2] 5:8 69: 22 interpreted ^[1] 18:8 interpreting ^[2] 20:12,17 interviewed ^[1] 47:19 investigate ^[1] 68:4 investigating ^[1] 5:24 involved ^[2] 72:2,7 involves ^[1] 28:11 involving ^[3] 27:5,8 29:20 irony ^[1] 26:21 ISACCO ^[1] 1:6 isn't ^[3] 32:24 33:1 63:21 issue ^[9] 8:8 41:8,16 48:15, 17 57:13 59:22 75:4 76:11 issued ^[4] 51:24 59:13 77: 23 80:12 issues ^[7] 5:16 9:8 26:19 28:5,6 42:10 59:16 issuing ^[1] 41:23 it'll ^[1] 53:10 Italian ^[9] 5:23 35:6,14 46: 12 59:13 73:15 80:8,25 81: 4 Italy ^[4] 59:3 60:2 73:16 81: 1 itself ^[8] 5:22 8:21 20:7 21: 24 39:3 55:7 73:6 83:14</p>	<p>4,19 21:5,11 22:5,12,15,24 23:2,14,14,16,17,18,19 24: 17,18 26:7 27:1,1,3,14 28: 1,14,24 29:1,9,10,17 30:14, 20 31:23 32:15,17 33:12, 16,21 34:1,4,7,12 35:13,21 36:3 37:7,8,9,14 38:10 39: 23 40:19,23 41:4,11,14,21 42:2 43:9,20 44:1 45:1,19 46:4,15 47:22,22,24,25 48: 5,9,14 49:7,7,8,18,23 50:3, 9,16 52:10,10,12 53:6,14, 24 54:22,24,24 55:1,5,17 56:4 57:15,17,20,23 60:4 61:5 62:15 63:19 64:4,23 66:22 67:20 68:5,16 69:10, 12,14,15 71:24 72:9 74:22 75:16,25 76:2,5 77:11 80: 16,20 83:20 Justice's ^[2] 32:17 54:4 Justices ^[1] 74:4</p>
<p style="text-align: center;">G</p> <p>gamble ^[1] 39:14 gave ^[3] 44:13,18 66:24 General ^[7] 2:5 18:8 42:14, 18 43:5 44:15 53:23 Generally ^[4] 15:24 41:22 42:18 55:24 gets ^[2] 28:4 41:21 getting ^[3] 5:5 23:8 72:6 give ^[5] 11:12 16:24 17:2 55:8 83:12 given ^[3] 19:21 56:13 75:8 gives ^[2] 15:11 75:23 goal ^[6] 15:13 17:20,21,24 20:16 48:13 goals ^[3] 15:2 17:14 21:21 GOLAN ^[1] 1:3 4:9 79:22 Gorsuch ^[19] 23:18 32:15 33:12,16,21 34:1,4,7,12 35: 13,21 36:3 37:8 52:11 66: 22 67:20 68:16 69:10,12 got ^[6] 12:13 24:24 45:16, 24 57:11 61:15 gotten ^[1] 33:9 Government ^[1] 50:18 Government's ^[1] 50:21 grant ^[1] 25:24 granted ^[2] 42:21 48:21 grave ^[100] 4:17,18 5:13 7: 6,13,17,20 8:4,10,14,18,19, 23 9:16,25 10:5 15:7,10,14 17:23 18:12,17 19:6,8,11, 25 20:25 21:19 23:4,4,13 25:22 27:4,6,10,13,20 28:2, 19,23 29:20 31:16 32:6,10, 20 33:22,24 34:14,19,24 35:1 37:16 40:4,9,18 41:5, 8 44:14 45:21 46:3 47:4 48:18 49:11,16,20 50:1,7,8 58:20 60:9,13,14,24 61:2, 14,15,24 62:14,21,25 63:9 66:4,10,13 67:3 70:8 73:2, 5,8,18 75:9 76:7,13 77:19, 19 80:15 81:12,17,20,25 graver ^[1] 40:9 great ^[2] 29:1,6 ground ^[1] 54:16 grounds ^[1] 7:3 group ^[1] 63:21 guarantee ^[1] 13:4 guess ^[2] 37:9,21</p>	<p style="text-align: center;">H</p> <p>habitual ^[6] 15:4 20:24 23: 9 40:3 51:7 59:9 Hague ^[13] 4:15 20:18 26: 15 40:8 56:12 58:10 68:11 69:20 70:6 75:14 77:7,25 81:10 Hague-expedited ^[1] 9:8 half ^[4] 23:23 30:18,21 33:7 hand ^[1] 46:4 handle ^[1] 47:3 handling ^[1] 20:18 hands ^[1] 66:25 happen ^[5] 30:25 46:14 47: 7,13 62:6 happened ^[4] 11:7 24:1 81: 1,2 happening ^[1] 47:10 happy ^[2] 33:16 60:3 hardest ^[1] 64:8 harm ^[17] 8:25 23:13 24:22 26:12 31:16 32:7,11 58:21 60:15,24 61:3 66:11 70:8 73:19 80:15 82:4,5 harmful ^[1] 59:1 health ^[1] 28:4 hear ^[2] 4:8 47:11 heard ^[3] 68:22 74:4 81:11 hearing ^[4] 26:23 47:16 59: 15 80:10 hearings ^[1] 47:17 heavy ^[2] 31:11 81:16 held ^[2] 29:24 32:19 help ^[1] 78:19 helpful ^[1] 57:15 helps ^[1] 58:24 hesitation ^[1] 29:6 hierarchy ^[1] 17:11 high ^[3] 10:4 26:10 81:21 higher ^[1] 22:25 highly ^[3] 31:14 32:12 62: 20 himself ^[1] 12:22 historically ^[1] 65:15 hold ^[1] 54:12 holding ^[3] 47:16 54:3,17 home ^[14] 49:19 58:6 59:3 62:25 66:9,15,21 67:4 70: 10 74:2,12 78:19 79:1,2 Honor ^[2] 6:14 36:1 Honor's ^[1] 65:11 horrific ^[2] 5:19 82:3 house ^[1] 7:7 however ^[5] 27:23 41:7 56: 13 62:10,22 hypothetical ^[3] 10:9 13: 20 44:13</p>	<p style="text-align: center;">J</p> <p>JACKY ^[1] 1:6 judge ^[23] 7:11,14 11:12,18 13:12,12 16:3,6,14 17:5 19:4 22:16,17 24:23 40:2 45:14 48:11 50:12 54:14 64:8,9,14 78:4 judges ^[9] 15:25 20:21 24: 20 57:5 69:19,20 70:5,6 75:24 judgment ^[9] 17:5 33:17 37:4 39:17 42:10 44:12 51: 18 76:4,19 judicial ^[1] 40:17 June ^[2] 59:15 80:10 jurisdiction ^[2] 42:22 44: 18 Justice ^[160] 2:6 4:3,3,13 6: 10,15 7:4 8:2,15 9:11,12, 13 10:23 11:1 12:9,13,18, 24 13:7,11,23 14:1,9,18,19, 20,22,23 15:18 16:2,17,18 18:4,5,14,22 19:9,16,20 20:</p>	<p style="text-align: center;">K</p> <p>KAGAN ^[12] 8:2,15 23:17 37:7,9 38:10 49:7,8,23 50: 3,9 55:5 KAREN ^[5] 2:3 3:3,13 4:11 80:22 KAVANAUGH ^[9] 23:19 24:17 32:17 52:12 53:6,14, 24 54:22 56:4 keep ^[3] 15:13 25:3 26:17 keeping ^[1] 26:15 kept ^[1] 9:10 key ^[1] 35:12 kidnapping ^[1] 46:6 kidnappings ^[1] 25:7 kind ^[7] 11:18 29:2 45:25 52:25 54:2,10 61:15 kinds ^[2] 53:7 56:2 KING ^[54] 2:3 3:3,13 4:10, 11,13 6:14,18 7:12 8:3,15 9:25 10:24 12:8,11,15,21 13:2,9,15,25 14:9 15:16 16:1,17,25 18:13,18 19:7, 10,19,21 20:13 21:2,10,20 22:11,14,18,25 23:11,22 25:21 27:6 28:1,21,25 29: 3 30:15 39:24 55:25 80:21, 22,24 Kingdom ^[1] 76:24 knowable ^[1] 69:8</p> <p style="text-align: center;">L</p> <p>language ^[3] 60:22 62:11 71:2 large ^[1] 78:13 last ^[3] 24:2,2 81:2 lasted ^[1] 36:22 later ^[3] 9:23 33:7 79:24 law ^[8] 4:19 20:12 33:1 38: 17 65:4,14 70:22 71:3 lawful ^[1] 40:2 lawyer ^[1] 11:18</p>	

Official

<p>layperson [2] 11:4,25 lead [4] 21:14 34:14 63:17 74:17 leads [1] 73:6 least [7] 25:10 34:15 37:4 46:22 66:24 68:25 72:10 leave [1] 39:18 leaves [2] 30:1,5 leaving [1] 9:18 left [2] 40:16 41:15 left-behind [1] 76:21 legal [6] 6:7 73:11,15 74:21 76:12 78:12 legislation [1] 5:1 lengthen [1] 9:15 lengthy [3] 5:21 9:7 10:21 less [2] 28:8 39:9 level [1] 27:10 life [1] 6:6 light [4] 37:6 38:12 39:10 49:5 likelihood [2] 60:25 61:10 limbo [1] 6:7 limit [1] 58:19 limitations [3] 17:2,24 22:21 limited [4] 6:22 26:4 40:6 65:24 limiting [1] 43:11 line [2] 42:16,25 lines [1] 50:16 litigant [1] 16:3 littile [1] 49:10 LIU [54] 2:5 3:6 29:12,13,16 30:18 31:3 32:2 33:8,13,19,24 34:2,5,11,17 35:17,23 36:5 37:9 38:9 40:5,22 41:2,10,12,20 42:1,7 43:19,25 44:5 45:2,18 46:19 48:4,8,13,16 49:8,22 50:2,5,22 52:17 53:13,17 54:13 56:17 57:16,19 66:23 67:22 68:19 live [2] 9:17 47:17 lives [1] 34:16 local [1] 67:11 long [8] 6:3,25 44:3 45:17 52:5 56:17 73:6 83:11 long-standing [1] 5:6 Look [7] 11:1 13:12,17 15:21 37:5 46:25 49:2 looked [1] 75:5 looking [2] 16:3 77:12 loose [1] 45:25 lost [1] 33:20 lot [5] 24:1 35:23 45:11 46:18 79:17 lower [3] 30:9 43:7 58:16</p>	<p>8 mandate [1] 36:16 mandated [1] 71:1 mandatory [9] 24:6 29:21 31:4 34:3 75:21 76:20 79:7,12 82:7 manner [2] 6:19 75:2 many [4] 30:17 42:10 43:15,15 map [1] 44:7 March [3] 1:11 77:23 81:24 margin [1] 76:15 Martin [1] 71:11 matter [5] 1:13 10:18 16:15 33:9 52:22 matters [6] 5:5,22 7:1 26:3 59:6 83:15 mean [22] 7:6 8:9,11 10:10 18:22 21:20 33:4 37:10 38:3 45:10,22 49:12,14,20 50:19 55:6,14 60:7 61:24 64:12 77:11 78:7 meaning [2] 60:13 71:6 means [8] 15:12 45:12,21,24 49:21 61:2 69:23 74:20 mean [3] 50:1,2,6 measure [4] 15:22 16:7 26:16 69:6 measures [105] 4:22 6:21,25 7:19 8:11,13,19 9:5,22 10:10,14,16 11:6,22 12:1,2 13:21 16:13 21:23 25:24 26:2,4 27:16 28:18 29:19 30:2 31:6,21 33:11 35:5,20 36:7,10,18,19 37:18 38:7,14,15 39:2,10 41:7,17 42:9 47:6 49:3,13,16,24 50:4,8,14 51:1,4,5,9,14,18 52:5,14,20 53:9 54:9 56:1,20 57:8 58:2,4 62:17,19 65:3,17,22,25 67:1,6,10,13,19,25 68:5,14 70:18 71:12,17,18,22 72:15,20,23 73:22,24 74:8 75:11 76:21 77:2 78:18 79:14,18,19 80:1 82:11,14,18,20 mechanism [3] 73:11 75:12 76:12 medical [4] 66:3,8,17 67:4 mental [1] 28:4 mentioned [2] 62:16 82:12 merely [1] 48:11 merits [1] 52:8 messy [1] 76:9 met [2] 4:17 21:16 middle [1] 82:15 might [10] 6:19 12:23 22:6 24:20 40:25 49:4 58:5 62:23 63:3 71:3 MIN [25] 2:9 3:10 57:20,21,23 60:11 62:8 64:22 65:1 66:22 67:16 68:10 69:2,11,18 72:8,13 75:14,17 76:1,4,18 78:10 80:19 82:10</p>	<p>mind [3] 15:13 26:15 42:21 minute [1] 12:10 minutes [1] 64:17 misunderstood [1] 30:10 mitigating [1] 60:16 Monasky [2] 46:22 59:22 money [1] 11:13 months [2] 36:21,22 morning [1] 4:8 most [5] 35:10 39:20 51:17 53:15 70:13 mostly [1] 72:19 mother [2] 26:9 81:19 motion [1] 35:16 motions [1] 76:19 motivating [1] 25:15 move [10] 7:18 9:23 16:8 26:20 27:19 34:16 45:11,25 47:20 79:6 moving [3] 7:9 41:18 69:3 Ms [50] 4:10,13 6:14,18 7:12 8:3,15 9:25 10:24 12:8,11,15,21 13:2,9,15,25 14:9 15:16 16:1,17,25 18:13,18 19:7,10,19,21 20:13 21:2,10,20 22:11,14,18,25 23:11,22 25:21 27:6 28:1,21,25 29:3 30:15 39:24 55:25 79:22 80:20,24 much [5] 21:12 27:15 28:7 55:9 78:6 multiple [2] 17:14,15 must [12] 4:21 26:2,2,4 48:10 61:3 64:11 66:13,19 68:12 73:25 74:7 mutual [2] 58:8 63:14</p>	<p>normal [2] 65:24 72:12 normally [1] 69:14 note [1] 82:1 nothing [1] 64:12 notion [1] 81:9 Notwithstanding [2] 37:15 63:9 novo [1] 47:1 nuclear [4] 7:8 9:17 27:16 69:4 number [5] 15:5 27:12 37:13 43:14 53:19</p> <p style="text-align: center;">O</p> <p>object [2] 24:5 78:13 objective [2] 31:15 32:4 objectives [3] 32:4 52:6 78:13 obligation [1] 81:15 obtain [2] 5:23 63:1 obtained [2] 51:20 79:24 obtaining [1] 79:25 obvious [4] 10:12 30:22,23 70:25 obviously [2] 67:9 68:20 occur [1] 62:16 occurred [4] 71:9 75:1,2,2 offense [1] 47:12 offer [1] 56:9 offered [1] 79:1 often [3] 56:14 73:6 75:14 oftentimes [1] 80:2 Okay [15] 7:4 13:8 20:4 21:11 25:2,9,13 40:19 50:9 61:15,21 64:2,5 69:12 76:11 old [1] 6:6 once [7] 4:16 6:2 9:1 38:3 39:6 61:16 81:16 one [29] 15:2,5 17:16 20:20 30:14 35:25 36:11 37:13 41:15,19 45:1 47:8 48:1,24 49:21 51:2 55:2,22 61:12 63:5 66:13 67:7,17 68:8 69:16 73:25 75:5 79:24 81:5 one-step [1] 62:9 ones [2] 26:20 27:5 ongoing [2] 14:2 72:6 only [15] 14:11,12,16 17:12 27:9 34:22 41:14 43:3 44:23 50:1,6 62:16 69:24 72:17 81:3 opening [1] 80:7 operating [1] 4:19 operation [1] 21:21 opinion [5] 25:14 49:1 64:9,20,25 opinions [2] 37:23 81:12 opposed [1] 61:23 option [2] 61:1 69:3 oral [8] 1:14 3:2,5,9 4:7,11 29:13 57:21 order [22] 5:24,25 8:13 18:</p>	<p>10,16 24:3 27:22 31:9 35:7,11,14 37:19 51:21,21,23 58:20,24 60:1 63:1 79:23 81:8 83:16 ordered [1] 36:6 orders [8] 41:24 59:14 65:25 70:14 72:21 78:23,24 80:12 original [2] 35:19 40:14 other [24] 5:7 7:2 14:4,5,6,13 20:6 25:2 44:4 46:4,5 48:24 49:3 51:15 52:6 53:1,21 54:21 56:18 57:2 59:18 64:18 66:19 74:20 others [1] 55:2 otherwise [2] 18:11 46:25 out [16] 12:10 13:9 30:15 39:24 40:12 43:23 44:7 46:5 50:10 55:3 59:19 68:4,20 69:19 70:5 77:4 outcome [1] 24:9 outgoing [1] 57:14 outset [1] 27:18 overall [1] 25:5 overarching [2] 48:16 73:25 overcome [3] 25:8 74:11,14 overkill [1] 25:17 overlap [1] 8:16 overlay [1] 13:3 overseas [1] 52:1 overturned [1] 4:24 own [7] 22:21 35:16 67:17,25 68:5 69:10,11</p> <p style="text-align: center;">P</p> <p>PAGE [4] 3:2 48:1 52:13 60:20 paints [1] 71:5 panoply [3] 13:20 65:17 71:16 paragraph [2] 50:15 55:4 paramount [2] 17:17 19:23 parent [4] 62:24 66:7 76:22 78:24 parent's [2] 74:10 76:23 parents [2] 47:18 63:7 part [5] 14:13 44:6 61:25 66:4 82:11 participate [1] 4:5 particular [4] 38:22 55:7 77:16 81:8 parties [20] 5:23 7:16 10:3,5,15 15:25 17:3,6 18:7 34:15 51:2,19 58:23 67:7 68:17 69:3 72:14 81:7,7 83:16 party [2] 15:23 74:9 past [2] 60:23 78:23 path [2] 13:5,19 pattern [1] 54:3 pay [1] 25:8</p>
--	--	--	---	---

Official

<p>payments ^[1] 27:21 people ^[2] 49:10 63:23 percentage ^[1] 27:10 perfectly ^[3] 34:20 35:8 51:16 performance ^[1] 13:4 perhaps ^[1] 13:18 period ^[1] 54:11 Permanent ^[1] 77:24 permissible ^[1] 19:3 person ^[1] 46:3 petition ^[3] 25:23 31:8 38:21 Petitioner ^[20] 1:4 2:4 3:4, 14 4:12 12:22 33:14,16,19, 20,22 47:4 52:13 65:18 71:5 73:12 74:10 75:3,3 80:23 phase ^[1] 7:14 physical ^[3] 8:24 28:11 82:5 pick ^[1] 54:4 picture ^[1] 35:7 place ^[10] 6:20 24:7 25:2 40:9 42:6 59:3 62:14,18 66:2 81:5 placeholder ^[1] 81:1 places ^[3] 10:5 19:23 31:11 plain ^[1] 81:14 plan ^[1] 71:16 plant ^[2] 27:17 69:4 please ^[5] 4:14 29:17 49:2 57:24 82:18 plus ^[3] 11:20 12:20,25 point ^[8] 14:10 23:24 26:6 33:13 35:12 55:2 67:2 70:24 pointed ^[2] 30:15 46:5 points ^[2] 54:5,14 police ^[2] 43:6 78:25 portion ^[1] 72:16 pose ^[1] 27:24 posed ^[1] 17:11 posited ^[1] 27:17 position ^[9] 6:10,20 19:13 31:1 32:9 45:3 55:17 56:23 63:11 possibility ^[2] 46:4 48:12 possible ^[13] 4:23 9:3 15:21 24:9,10 31:10,10 38:10 39:8 48:10 64:5 66:20 77:20 possibly ^[1] 42:3 potential ^[4] 4:21 58:21 60:16 61:9 power ^[1] 44:25 practice ^[3] 68:11 71:4 77:9 preamble ^[1] 17:18 precisely ^[1] 66:12 preminent ^[1] 17:16 preferable ^[1] 9:4 preliminary ^[1] 49:12</p>	<p>premise ^[1] 59:5 present ^[9] 4:4 8:23 15:25 19:11 53:15,18 56:7,14 69:3 presented ^[3] 68:17 73:22 74:8 pressure ^[1] 39:9 presumption ^[4] 53:23 70:9 74:11,13 pretty ^[6] 7:5 21:12 27:18 33:18 41:4 54:15 prevent ^[3] 55:17,21 61:1 prevents ^[1] 23:12 primary ^[1] 20:16 principle ^[2] 10:19 48:6 principles ^[4] 18:2 43:5 44:16 78:12 prior ^[1] 81:12 prioritizing ^[1] 17:11 priority ^[2] 15:5,6 probably ^[1] 52:17 problem ^[12] 11:2 12:17 16:11 18:6 20:20 24:20 25:20 29:7 52:4 63:20 68:2,8 problematic ^[1] 23:21 problems ^[2] 25:15 30:15 procedural ^[3] 36:24 44:8 83:8 proceed ^[2] 28:24 29:5 proceeding ^[9] 9:9 10:25 13:25 15:3 23:7 28:7 29:8 80:25 81:5 proceedings ^[16] 5:4,16 17:19 30:12,24 32:1 36:22 40:8 41:16 51:10,22 61:11 67:13 74:9 75:15,18 process ^[17] 6:1 9:16 10:19,21 22:1 23:24 24:4,7 26:15 61:18,25 62:4,9 72:24 73:2 83:5,9 processes ^[1] 76:19 produced ^[1] 75:20 producing ^[1] 74:19 profession ^[1] 63:24 progressing ^[1] 23:23 prolong ^[2] 51:9 67:13 prolonging ^[1] 73:4 promise ^[2] 11:13,17 promises ^[12] 21:23,25 82:21,22 promoted ^[1] 69:21 prompt ^[4] 18:2 32:5 47:16 52:7 promptly ^[1] 45:12 propensity ^[1] 78:23 proper ^[2] 34:18 38:16 proposals ^[1] 71:8 propose ^[2] 10:15 82:18 proposed ^[6] 16:14 36:20 55:21 71:13 72:14 82:20 proposition ^[1] 22:8 prospects ^[1] 38:1 protect ^[15] 15:6 26:8 61:3 62:19 63:3,8,17 65:8 70:</p>	<p>11 74:18 77:2 79:4 80:1, 13 82:24 protected ^[1] 66:14 protecting ^[8] 26:5,14 31:15 32:6 59:1,14 73:17 74:13 protection ^[7] 63:2 65:25 70:14 74:15,16 78:25 79:23 protective ^[5] 6:4 41:24 51:21 65:24 83:16 prove ^[1] 10:6 proved ^[1] 47:15 proven ^[4] 19:4 28:19 81:17,20 provided ^[4] 6:21 8:20 42:4 74:5 provides ^[2] 4:15 6:7 providing ^[2] 21:17 58:13 proving ^[2] 27:10 33:10 provisional ^[1] 58:19 provisions ^[2] 20:14 70:2 psychological ^[4] 8:24 28:5,12 82:4 purpose ^[6] 25:6 58:1,7 63:15 65:24 74:1 purposes ^[2] 5:2 17:15 pursuant ^[1] 62:11 pursue ^[2] 32:3 67:8 put ^[13] 23:6 31:1 36:25 48:23 51:19 53:1 64:3 65:20 66:1 71:20 73:12 76:22 81:5 putting ^[2] 20:15 55:10</p> <p style="text-align: center;">Q</p> <p>question ^[15] 14:24 15:19 18:24 24:19 37:14,19,21 38:10,18 41:14 45:2 47:2 50:16 73:21 74:3 question's ^[1] 77:17 questioning ^[1] 48:1 questions ^[6] 6:9 30:13 37:10 39:24 60:3 80:5 quick ^[3] 33:6,6 54:10 quickly ^[1] 30:22 quite ^[4] 47:15 72:5 77:13, 20</p> <p style="text-align: center;">R</p> <p>raise ^[3] 27:12 51:24 53:20 raised ^[3] 15:22 51:3 67:6 range ^[3] 4:21 13:20 29:19 rarely ^[1] 73:8 rather ^[3] 24:15 42:23 59:11 ratify ^[1] 14:15 reach ^[2] 10:1 45:14 reaching ^[2] 69:19 70:5 reaction ^[1] 11:25 read ^[2] 37:23 68:23 readily ^[5] 65:21 68:13,17 69:6 70:25 reading ^[1] 81:14</p>	<p>reads ^[1] 11:25 ready ^[1] 80:8 real ^[1] 73:23 really ^[12] 8:9,12 12:16 16:9 18:23 28:22 38:4 46:24 56:8 76:14 77:18 79:25 reason ^[11] 16:19,21,22,24 17:2 34:22 39:1,4 54:17 59:18 81:18 reasonable ^[2] 58:1 78:17 reasonableness ^[2] 44:9, 11 reasonably ^[3] 50:25 51:12 62:16 reasoned ^[2] 17:5,7 reasoning ^[2] 17:8 54:15 reasons ^[2] 4:25 30:23 REBUTTAL ^[3] 3:12 80:20, 22 recall ^[1] 68:24 recent ^[1] 35:10 recognize ^[2] 25:14 83:6 recognized ^[1] 17:25 recommend ^[1] 77:20 record ^[8] 32:14 37:22 38:19 39:21 45:4 65:20 71:8, 20 reduce ^[1] 80:14 reevaluation ^[1] 23:25 referring ^[1] 27:12 refers ^[1] 60:9 reflect ^[1] 44:16 refuge ^[1] 78:25 refuse ^[1] 58:4 refused ^[1] 32:21 refusing ^[2] 63:1,2 regular ^[1] 19:15 reject ^[3] 13:18 17:3 31:17 rejecting ^[1] 70:17 relates ^[1] 37:13 relating ^[1] 59:7 reliable ^[1] 82:23 relief ^[1] 63:3 rely ^[1] 15:25 remain ^[1] 5:14 remains ^[1] 5:10 remand ^[13] 23:20,24 30:11,25 31:22 34:23 35:16 36:12 38:11 39:21 71:13, 15 72:18 remanded ^[1] 65:15 remedies ^[1] 70:25 remedy ^[8] 7:18 24:10,11, 15 31:14 57:9 83:11,15 remember ^[3] 25:5,7 69:21 remove ^[2] 31:18 39:7 render ^[1] 48:19 renders ^[1] 31:13 report ^[1] 40:13 represent ^[1] 80:11 representative ^[1] 45:6 request ^[1] 81:6 requested ^[1] 18:9 require ^[5] 23:24 58:1 70:</p>	<p>22 73:9,10 required ^[7] 6:12 13:3 66:8 67:23 73:2 81:14 83:2 requirement ^[5] 4:20,24 75:19 82:8,24 requirements ^[2] 22:21 83:7 requires ^[1] 29:18 residence ^[6] 15:4 20:24 23:9 40:3 51:8 59:9 resolution ^[4] 5:13 26:16 75:22 83:19 resolve ^[4] 5:10 7:21 28:7, 8 resolved ^[2] 30:22 73:8 respect ^[1] 46:2 Respondent ^[11] 1:7 2:10 3:11 29:23 33:9 36:19 38:22 39:4,13 57:22 75:4 response ^[1] 50:6 restraining ^[1] 27:22 restrictive ^[1] 71:6 result ^[3] 34:21 35:15 73:3 results ^[3] 6:1 58:11 63:18 return ^[50] 4:16,22 7:24 15:3,9 17:11,20 18:3,10,16 19:12 20:23 24:2 25:23 31:9, 12,14 32:21 34:20 35:4 36:1,6,12,14 38:12 39:9 48:19, 24,25 49:4 58:5,24 59:24 60:1 61:2,4 62:13,18,20 63:8,9 71:11 74:1 75:12 76:17 78:19 80:6 81:13,15, 16 returned ^[5] 8:23 15:9 18:11 48:10 71:23 returning ^[2] 19:24 79:9 reversal ^[6] 5:11 6:7 23:21 33:3 34:14 83:19 reversed ^[1] 32:22 review ^[2] 43:6 47:1 reviewable ^[1] 42:11 RICHARD ^[3] 2:9 3:10 57:21 rights ^[1] 41:25 rigid ^[2] 44:22 54:20 risk ^[108] 4:17,18 5:13 7:6, 13,17,20 8:4,10,14,17,18, 20,23 9:5,7,16 10:1,6 11:9 12:3,4,5 17:23 18:12,17 19:6,8,11 20:1,25 21:19 23:4,4,13 26:12 27:4,7,11, 13,20 28:3,20,23 29:20 32:7,10,21 33:22,24 34:14,19, 24 35:1,11 37:16 40:4,7,18 41:5,9 44:14 45:21 46:3 47:4 48:18 49:11,16,20 50:1,7,8 55:11 58:20 60:9,13, 14,15,24 61:2,14,15,24 62:14,21,25 63:9 66:4,10,13 67:3 70:8 73:2,5,8,18 75:9, 10 76:7,14 77:19,20 80:14, 15 81:12,17,20,25 risks ^[2] 25:22 56:6</p>
--	---	---	---	---

Official

<p>risky ^[1] 61:21</p> <p>ROBERTS ^[27] 4:3 6:10,15 7:4 9:11,13 23:14 27:1 29:10 30:14,20 31:23 45:1,19 47:22 49:7 52:10 54:24 57:17,20 60:4 61:5 71:24 72:9 80:16,20 83:20</p> <p>robust ^[1] 6:4</p> <p>role ^[5] 43:1,2 51:6 52:1 53:11</p> <p>room ^[1] 34:25</p> <p>round ^[1] 36:17</p> <p>rule ^[41] 4:19 16:5 19:17 21:12,13 24:6 28:22 29:2,21,25 30:6 31:4,7,18 34:3,10 36:25 37:12 38:3 40:11 41:5 42:15,17,23,24 44:21,22 45:5 46:16,21 48:23 54:20 55:15 60:5 64:20 65:13,18,19 74:4 75:7 83:2</p> <p>rules ^[1] 75:17</p> <p>ruling ^[1] 35:3</p> <p>run ^[1] 9:6</p> <p>runs ^[1] 5:2</p> <hr/> <p style="text-align: center;">S</p> <p>SAADA ^[4] 1:6 4:9 82:4,20</p> <p>Saada's ^[1] 5:18</p> <p>Safe ^[6] 5:13 6:7 24:11,25 58:5 83:18</p> <p>safety ^[5] 5:4 17:13,15 19:23 20:15</p> <p>same ^[11] 6:3 24:4 47:10,12 52:25 55:2 61:25 62:10 79:11,12 81:2</p> <p>sanction ^[1] 63:6</p> <p>satisfy ^[4] 10:4,5 21:23 22:4</p> <p>saying ^[4] 15:20 53:8 60:22 77:12</p> <p>says ^[15] 7:8 9:18 18:9 19:20 24:24 44:3 45:7,8,13 52:14 69:14,22 75:3,4 82:10</p> <p>scale ^[5] 53:1 55:11,14,22 81:16</p> <p>scales ^[5] 31:12,19 39:7 48:24 49:6</p> <p>scheduled ^[3] 59:15,15 80:10</p> <p>scope ^[1] 30:10</p> <p>Second ^[56] 4:20 5:21 10:2 13:2 15:6,20 16:5 21:14,22 24:6 25:4,16 29:18 30:6 31:3,7,18 34:3,10 35:18,24 36:9,11,24 37:11,21 38:3,18,25 39:1,3 42:15,16,23 43:11 44:21 48:22 50:23 55:12 60:20 64:11 65:5,13,14 66:7 68:2 70:21,24 71:2,10,13,14 72:17 82:7,21 83:1</p> <p>secondary ^[1] 17:12</p> <p>seconds ^[1] 71:25</p>	<p>secure ^[1] 74:15</p> <p>see ^[10] 8:5 11:8 12:6 20:19 43:14,17 55:16,20 63:20 66:23</p> <p>seek ^[1] 63:2</p> <p>seeking ^[1] 28:21</p> <p>seem ^[2] 11:15 16:12</p> <p>seemed ^[2] 13:17 68:3</p> <p>seems ^[13] 9:14,24 15:23 16:20 27:15 28:16 45:2 53:14 54:8 56:2,5 63:20 64:5</p> <p>seen ^[2] 47:15,20</p> <p>self-directed ^[1] 35:15</p> <p>send ^[15] 19:6 24:15,22 25:1 37:4,11,17 38:8 39:14 40:2,17 49:19 56:9 82:9 83:10</p> <p>sending ^[3] 23:12 30:16 44:13</p> <p>sense ^[5] 7:22 10:19 14:2 21:4 46:18</p> <p>sensitive ^[1] 57:7</p> <p>sent ^[5] 23:3,10 32:10 41:6 64:15</p> <p>separate ^[6] 8:18 9:10,14,20 61:7 62:7</p> <p>sequence ^[1] 47:9</p> <p>series ^[1] 43:17</p> <p>serve ^[1] 24:13</p> <p>served ^[1] 59:7</p> <p>set ^[7] 35:19 36:7 39:2 40:10,20,20 41:6</p> <p>sets ^[1] 44:22</p> <p>setting ^[2] 22:25 53:23</p> <p>several ^[2] 74:4 75:17</p> <p>shape ^[1] 56:3</p> <p>shouldn't ^[5] 15:8 16:23 64:13,15 83:11</p> <p>show ^[3] 66:8,14,16</p> <p>shown ^[2] 20:25 78:22</p> <p>shows ^[1] 17:23</p> <p>side ^[3] 44:9,11 46:5</p> <p>sides ^[1] 57:12</p> <p>signatory ^[4] 5:7 14:11 41:1 58:9</p> <p>significantly ^[1] 67:14</p> <p>similar ^[1] 32:16</p> <p>simple ^[5] 7:6,21 10:12 41:18 70:19</p> <p>simply ^[12] 8:21 13:21 35:25 36:12 39:14 42:17 51:3 56:10 57:11 62:4 71:19 74:6</p> <p>simultaneous ^[1] 73:20</p> <p>since ^[3] 20:10 24:2 81:3</p> <p>situation ^[4] 22:3 56:25 62:2,25</p> <p>situations ^[2] 23:13 40:11</p> <p>six ^[4] 6:5 45:14 46:10 73:9</p> <p>sketched ^[1] 25:20</p> <p>small ^[3] 27:9 40:10,20</p> <p>Solicitor ^[2] 2:5 18:7</p> <p>solid ^[1] 54:15</p> <p>solutions ^[2] 7:24,25</p>	<p>solve ^[1] 29:6</p> <p>somehow ^[1] 7:1</p> <p>sometimes ^[3] 47:18 49:12,14</p> <p>sorry ^[3] 14:21 34:8 71:25</p> <p>sort ^[16] 12:14 18:5 24:6 39:16 41:25 42:19 44:8 52:18 53:4,23 54:15 61:6 62:6 63:2 66:19 74:19</p> <p>sorts ^[3] 41:22 44:15 54:21</p> <p>SOTOMAYOR ^[19] 14:18,20,23 15:18 16:2,17,18 18:4 47:25 48:5,9,14 68:5 69:14 74:22 75:16,25 76:2,5</p> <p>Sotomayor's ^[1] 50:16</p> <p>sought ^[3] 78:24,25 79:23</p> <p>sound ^[3] 42:10 51:17 78:12</p> <p>sounds ^[2] 19:17 46:2</p> <p>space ^[1] 12:12</p> <p>speaking ^[1] 26:6</p> <p>special ^[1] 77:14</p> <p>specific ^[1] 57:6</p> <p>Specifically ^[1] 58:19</p> <p>speed ^[5] 46:17,20,23 75:22 77:10</p> <p>speedy ^[1] 15:3</p> <p>spent ^[1] 6:6</p> <p>sponte ^[3] 67:18,25 70:16</p> <p>St ^[1] 71:11</p> <p>stage ^[5] 7:13,18 8:11 10:2 62:10</p> <p>standard ^[10] 23:1,12 31:11 37:6 42:15,19,20 46:20 48:22 81:21</p> <p>standards ^[13] 21:6,16 22:6,6,10,11,19 23:2 43:18,23 50:11,17 55:19</p> <p>stands ^[1] 82:2</p> <p>start ^[2] 39:24 80:25</p> <p>started ^[1] 14:24</p> <p>Starting ^[1] 67:16</p> <p>State ^[4] 5:6 18:10 40:13 50:17</p> <p>stated ^[2] 68:12 80:7</p> <p>statement ^[5] 52:13,19 53:5 77:23 80:7</p> <p>STATES ^[29] 1:1,15 2:7 3:7 14:11,15 20:8,21 29:14 39:25 55:6,21 56:22 57:1,12 58:12 59:19 60:19 65:17,18,23 66:17 67:17 69:18,25 70:4 71:5 72:25 78:11</p> <p>States' ^[3] 44:6 55:17 63:11</p> <p>stating ^[2] 71:19 74:14</p> <p>statute ^[6] 18:6 20:9,10 45:8 60:6,8</p> <p>staying ^[1] 40:7</p> <p>sticking ^[1] 55:2</p> <p>still ^[4] 11:24 49:16,25 77:2</p> <p>stop ^[2] 15:19 25:7</p> <p>straighten ^[1] 12:10</p> <p>straightforward ^[2] 7:20</p>	<p>27:19</p> <p>strong ^[2] 20:5 52:18</p> <p>structure ^[1] 43:23</p> <p>stuck ^[1] 20:20</p> <p>sua ^[3] 67:18,25 70:16</p> <p>subject ^[3] 7:24 25:24 77:22</p> <p>submission ^[1] 17:6</p> <p>submissions ^[2] 10:17 17:3</p> <p>submit ^[1] 7:16</p> <p>submitted ^[2] 83:21,23</p> <p>subsection ^[1] 61:8</p> <p>substantial ^[2] 56:18 72:14</p> <p>substantially ^[1] 80:13</p> <p>substantiate ^[1] 73:14</p> <p>substantive ^[4] 37:3 44:11 81:4 83:8</p> <p>sufficiency ^[4] 31:5,20 38:13 49:3</p> <p>sufficient ^[9] 36:8 37:18 38:7,16 52:21 62:17 66:16 70:21 77:1</p> <p>suggest ^[4] 25:13,21 54:20 68:3</p> <p>suggested ^[3] 55:25 67:18 68:6</p> <p>suggesting ^[2] 28:17 36:2</p> <p>suggests ^[1] 65:4</p> <p>summarize ^[1] 23:20</p> <p>summary ^[3] 75:15 76:4,19</p> <p>supervise ^[1] 70:15</p> <p>supervised ^[1] 66:1</p> <p>supplanted ^[1] 30:6</p> <p>support ^[1] 27:21</p> <p>supported ^[7] 58:10 60:19,21,22 65:23 69:19 70:4</p> <p>supporting ^[3] 2:7 3:8 29:15</p> <p>suppose ^[2] 37:10 40:10</p> <p>supposed ^[9] 22:13 33:6 45:9,9,14 46:7,9,14 53:25</p> <p>SUPREME ^[2] 1:1,14</p> <p>sustained ^[1] 5:18</p> <p>swift ^[4] 5:13 6:8 24:11 83:18</p> <p>system ^[11] 15:24 58:8 63:14 64:9 69:15 70:11,13 73:11,17 74:12,21</p> <hr/> <p style="text-align: center;">T</p> <p>talked ^[3] 55:18 63:13 77:8</p> <p>tangent ^[1] 22:1</p> <p>temporary ^[4] 26:16 54:1,11,12</p> <p>tend ^[1] 53:7</p> <p>tendency ^[1] 25:3</p> <p>term ^[1] 49:11</p> <p>terminology ^[1] 12:8</p> <p>terms ^[2] 47:7 52:23</p> <p>terribly ^[1] 72:2</p> <p>testify ^[1] 47:18</p>	<p>testimony ^[2] 73:3,10</p> <p>text ^[4] 4:25 29:22 57:25 60:12</p> <p>Thanks ^[1] 57:19</p> <p>themselves ^[3] 60:19 72:25 77:5</p> <p>theoretical ^[1] 71:18</p> <p>there's ^[34] 8:4,5,9,14 9:21,25 10:8 12:3,3,5 15:7 16:7 19:11,25 23:4 24:21 35:1 38:4 41:5,13 42:13 49:16 51:21 54:20 56:17 60:25 61:3,13,21 65:7 67:3 73:7 76:6 83:18</p> <p>therefore ^[4] 20:2 33:3 59:25 63:8</p> <p>they'll ^[1] 78:7</p> <p>they've ^[2] 21:15 51:20</p> <p>thinking ^[4] 8:10 24:19 28:8 44:8</p> <p>thinks ^[1] 34:17</p> <p>third ^[2] 24:16 33:12</p> <p>Thomas ^[1] 4:3</p> <p>thorough ^[1] 77:3</p> <p>though ^[2] 42:14 53:7</p> <p>thoughtful ^[2] 33:5,5</p> <p>three ^[9] 5:11 23:23 26:24 30:18,20 33:7 67:10 81:3,23</p> <p>threshold ^[3] 18:6 26:11 80:15</p> <p>throw ^[1] 68:19</p> <p>thumb ^[13] 31:11,18 39:7 48:23 49:5 53:1 55:11,14,22 64:3,7 77:13 81:16</p> <p>timing ^[1] 47:7</p> <p>tiptoeing ^[1] 28:15</p> <p>today ^[4] 4:4 5:12 26:24,25</p> <p>together ^[1] 47:13</p> <p>took ^[2] 58:16 83:11</p> <p>top ^[1] 13:4</p> <p>touched ^[2] 31:24 32:18</p> <p>towards ^[1] 81:16</p> <p>toxic ^[1] 41:18</p> <p>track ^[1] 68:18</p> <p>transcript ^[1] 4:7</p> <p>treated ^[1] 66:15</p> <p>treatment ^[2] 66:9,17</p> <p>treats ^[1] 17:6</p> <p>treaty ^[8] 5:8 20:14,14,17 25:6 44:24 59:10 77:14</p> <p>trial ^[8] 9:7 10:14 13:12 32:20 34:13 47:11 82:11,13</p> <p>tried ^[1] 44:7</p> <p>trouble ^[2] 35:21,23</p> <p>true ^[6] 36:23 41:3 53:20 72:11 77:6 82:12</p> <p>trust ^[2] 58:9 63:14</p> <p>try ^[10] 13:1 25:7,15 28:8 29:6 50:10 56:8 82:8,24 83:12</p> <p>trying ^[8] 13:3,5 21:22 25:6,16 45:5 72:19 73:13</p> <p>Tuesday ^[1] 1:11</p>
---	---	--	--	--

Official

<p>two ^[18] 7:9 9:6,10,15 10:20 12:10 15:1 16:8,10 24:2 33:9 35:25 36:11 37:10 45:12 47:6 67:7 73:18</p> <p>two-step ^[1] 8:12</p> <p>type ^[2] 26:22 29:7</p> <p>types ^[6] 26:13 27:7 28:13 53:21 74:5 79:2</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>U.K ^[1] 77:14</p> <p>U.S ^[6] 5:15 50:18,20 58:12 73:16 81:6</p> <p>ultimate ^[1] 83:9</p> <p>ultimately ^[5] 21:20 35:5 59:10 63:15 74:3</p> <p>unable ^[1] 4:4</p> <p>uncertainty ^[1] 75:8</p> <p>unclear ^[1] 38:19</p> <p>under ^[15] 4:19 18:25,25 19:2 29:21 30:21 31:7 34:2 38:6,16 42:10 44:19 46:25 76:10 83:6</p> <p>underlying ^[1] 52:8</p> <p>understand ^[5] 11:23 35:13 55:6 67:2 76:2</p> <p>understanding ^[3] 18:6 32:14 38:17</p> <p>understood ^[2] 44:23 67:22</p> <p>undertaking ^[1] 27:22</p> <p>undertakings ^[12] 11:8,15,16,19,20 12:19,19,21,24 64:13 71:12 72:20</p> <p>undisturbed ^[1] 30:5</p> <p>undo ^[2] 36:23 37:2</p> <p>undue ^[1] 23:7</p> <p>unduly ^[2] 23:7 51:9</p> <p>unfettered ^[1] 17:1</p> <p>unfortunate ^[1] 45:3</p> <p>uniform ^[1] 69:22</p> <p>uniformly ^[1] 70:3</p> <p>unique ^[2] 27:24 58:17</p> <p>UNITED ^[3] 1:1,15 2:7 3:7 14:11,15 20:8,21 29:14 39:25 44:6 55:6,16,21 56:22 57:1,12 58:12 60:18 63:11 65:17,23 66:17 67:17 69:18,24 70:4 71:5 72:25 76:24 78:11</p> <p>unless ^[1] 18:19</p> <p>unlikely ^[1] 53:9</p> <p>unrepresentative ^[1] 45:4</p> <p>unsure ^[1] 76:13</p> <p>until ^[1] 54:3</p> <p>unusual ^[2] 18:20 62:20</p> <p>up ^[17] 11:10,13 13:5 22:2 28:15 32:16 33:10 44:22 46:17,20,23 53:23 54:4 64:17 75:22 77:10 82:14</p> <p>uphold ^[1] 16:16</p> <p>urge ^[2] 80:5 83:19</p> <p>useful ^[1] 13:13</p> <p>using ^[3] 16:12 49:11 65:</p>	<p>10</p> <p>usurp ^[3] 51:6,25 67:11</p> <p>usurping ^[1] 53:11</p> <hr/> <p style="text-align: center;">V</p> <hr/> <p>vacate ^[2] 30:11 37:3</p> <p>vacatur ^[4] 2:8 3:8 29:15 34:23</p> <p>value ^[1] 77:1</p> <p>values ^[1] 18:1</p> <p>various ^[1] 37:23</p> <p>vary ^[1] 52:23</p> <p>vast ^[3] 6:6 10:2 27:4</p> <p>venturing ^[1] 52:8</p> <p>verbal ^[1] 28:12</p> <p>versus ^[3] 4:9 19:12 79:15</p> <p>vests ^[1] 15:17</p> <p>view ^[8] 5:11 31:11 37:2 49:21 50:1,11,21,24</p> <p>views ^[3] 5:6 38:13 78:5</p> <p>violate ^[2] 58:7 78:23</p> <p>violated ^[1] 78:22</p> <p>violence ^[17] 28:3 52:16,19,23 53:2,5,19,20 54:8 56:1,14,19 57:4 58:22 59:22 73:17 82:3</p> <p>violence-type ^[1] 56:6</p> <p>visitation ^[2] 41:25 66:1</p> <hr/> <p style="text-align: center;">W</p> <hr/> <p>wading ^[2] 9:8,9</p> <p>wait ^[1] 16:8</p> <p>waiting ^[1] 16:9</p> <p>walking ^[1] 13:19</p> <p>wants ^[4] 22:17 25:5 44:3 45:23</p> <p>warranted ^[2] 5:11 33:3</p> <p>wary ^[1] 53:22</p> <p>Washington ^[2] 1:10 2:6</p> <p>waste ^[3] 7:8 9:18 41:18</p> <p>watch ^[1] 11:20</p> <p>way ^[14] 8:2,8 18:7 20:7 21:24 24:5 48:24 54:21 55:22 56:10 61:3 71:4 82:9,17</p> <p>ways ^[2] 39:12 49:11</p> <p>week ^[1] 79:24</p> <p>weeks ^[6] 7:9 16:8,10 45:15 46:10 73:9</p> <p>weigh ^[1] 49:4</p> <p>welcome ^[2] 6:9 30:13</p> <p>whatever ^[7] 7:15 22:17 24:23 36:18 44:2 62:3 77:25</p> <p>whatsoever ^[1] 16:19</p> <p>whereas ^[1] 27:20</p> <p>Whereupon ^[1] 83:22</p> <p>whether ^[30] 8:4,5,9,14,21 9:3,21 12:5 16:10 20:22 32:9 35:1 36:14 39:4,12 41:8 43:20 46:16 48:17 51:25 52:20 57:13 61:13 65:25 67:3 75:1 77:5,18,19 79:11</p> <p>who's ^[2] 76:9,13</p>	<p>whole ^[1] 62:6</p> <p>whom ^[1] 76:9</p> <p>wife ^[1] 11:10</p> <p>will ^[19] 4:4 24:19 25:3 46:20,22,22 47:18,18 52:15 53:9 54:9 63:6,17 64:12 75:22 77:18 79:5,21 80:2</p> <p>within ^[6] 14:3,16 45:14 46:10 51:15 73:9</p> <p>without ^[8] 5:24 8:10 17:24 23:5,7 37:20 60:24 76:16</p> <p>witnesses ^[1] 47:17</p> <p>word ^[4] 11:16,21 16:12 63:25</p> <p>words ^[9] 11:6,7 12:1,16 25:13,18 64:7,24 77:13</p> <p>work ^[5] 53:10,11 69:24 78:5 79:5</p> <p>workable ^[2] 67:9 68:20</p> <p>working ^[3] 14:16 43:22 51:5</p> <p>world ^[4] 10:9 29:24 49:24 70:1</p> <p>worry ^[1] 66:18</p> <p>worth ^[2] 39:14 51:13</p> <p>worthwhile ^[1] 26:14</p> <p>wow ^[1] 50:12</p> <p>write ^[9] 11:24 25:14 48:2 50:15,15 55:4 63:21,25 64:24</p> <p>writing ^[1] 63:19</p> <p>wrongly ^[1] 30:6</p> <hr/> <p style="text-align: center;">Y</p> <hr/> <p>year ^[1] 71:9</p> <p>years ^[15] 5:12 6:5 23:23 24:2 26:24 30:17,19,21 33:7 37:1 45:12 64:15 81:3,11,23</p> <p>York ^[4] 2:3,3,9,9</p> <p>young ^[1] 82:5</p> <hr/> <p style="text-align: center;">Z</p> <hr/> <p>zero ^[1] 33:14</p>
--	---	--