

No. 25-1013

IN THE
Supreme Court of the United States

OFFICIAL COMMITTEE OF ASBESTOS CLAIMANTS OF
BESTWALL LLC,
Petitioner,

v.

BESTWALL LLC,
Respondent.

ON PETITION FOR WRIT OF CERTIORARI TO THE UNITED
STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT

**BRIEF OF PROFESSOR D. THEODORE RAVE
AS AMICUS CURIAE IN SUPPORT OF
PETITION FOR WRIT OF CERTIORARI**

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INTEREST OF AMICUS CURIAE¹

Professor D. Theodore Rave is the Bernard J. Ward Centennial Professor of Law at the University of Texas School of Law. As a scholar of complex litigation and mass torts, Professor Rave has an established interest in the issues presented in this case and relevant expertise that can assist the Court in this appeal. Several of his recent articles have focused on mass tort bankruptcies, including *Dissonance and Distress in Bankruptcy and Mass Torts*, 91 FORDHAM L. REV. 310 (2022) (with Andrew D. Bradt & Zachary D. Clopton) and *MDL Strikes Back*, 110 CORNELL L. REV. __ (forthcoming 2026) (with Andrew D. Bradt & Zachary D. Clopton). Most recently, he has written *Bankruptcy v. Multidistrict Litigation for Mass Torts*, 114 CALIF. L. REV. __ (forthcoming 2026), which analyzes many of the questions at issue in this proceeding and shows that bankruptcy is not an appropriate forum for resolving mass torts when the defendant is not in financial distress.

Professor Rave was retained by the Official Committee of Talc Claimants as an expert witness in *In re LTL Management, LLC*, Case No. 23-12825

¹ Pursuant to Supreme Court Rule 37.6, counsel for *amicus* represent that they authored this brief in its entirety and that none of the parties or their counsel, nor any other person or entity other than *amicus* or their counsel, made a monetary contribution intended to fund the preparation or submission of this brief. Pursuant to Rule 37.2(a), counsel for *amicus* also represent that all parties were provided notice of his intention to file this brief at least 10 days before it was due.

(Bankr. D. N.J.). The outcome of that proceeding was dismissal by the Bankruptcy Court based on the debtor’s failure to satisfy the “gateway” issue of financial distress, which dismissal was affirmed by the Third Circuit. *In re LTL Mgmt., LLC*, 652 B.R. 433, 436 (Bankr. D. N.J. 2023), *aff’d*, 2024 WL 3540467 (3d Cir. July 25, 2024).

SUMMARY OF ARGUMENT

Certiorari is warranted to address the Court of Appeals for the Fourth Circuit’s holding that solvent debtors suffering no financial distress may nonetheless invoke Chapter 11 to isolate their tort liabilities in the bankruptcy system, preventing plaintiffs’ recovery through litigation. Petitioner explains how the Fourth Circuit misinterpreted 11 U.S.C. § 1112(b)(1)’s “good faith” requirement and the Constitutional infirmities its holding creates. But the ramifications of the Fourth Circuit’s approach on Americans’ ability to pursue relief are just as profound—and more disturbing.

Georgia Pacific, a healthy company with ample assets to satisfy all its current and anticipated liabilities, is seeking to use bankruptcy to wholly displace the tort liability system. Allowing healthy companies to flee to bankruptcy to escape tort litigation systematically shifts leverage from mass tort claimants to defendants, disempowers individuals with the strongest claims while inviting the mass filing of weaker claims, and provides a windfall for shareholders at the expense of the very parties bankruptcy was designed to protect—the creditors, including tort creditors.

Bankruptcy’s powerful tools—to stay all litigation, to cut off future claims for recovery, and to bind nonconsenting claimants to a resolution—might be justifiable as an attempt to preserve value and ensure an equitable distribution when a mass tort defendant doesn’t have enough money to go around. But allowing entities that are *not* in financial distress to invoke these tools is an invitation for abuse. And because corporate debtors may easily rearrange their corporate structure or move their assets to file bankruptcy virtually anywhere in the country, the Fourth Circuit’s outlier holding has effects far beyond its geographic boundaries.

Distress-free bankruptcy undercuts tort claimants in three crucial ways. First, the tortfeasor may engage in forum-shopping for the most favorable set of rules (despite its position as the would-be defendant). Second, the tortfeasor may stay all litigation depriving claimants of their day in court and ability to threaten trial. And third, the tortfeasor may impose a resolution of all claims even over the objection of tort victims with the strongest claims and most severe injuries.

Gimmicks like the so-called “Texas Two-Step” further compound this disparity by allowing a debtor and its corporate affiliates to engage in a divisional merger and then to isolate tort liability in bankruptcy while continuing ordinary operations outside of it. This move minimizes the pain of bankruptcy for corporate managers and shareholders while

circumventing fundamental safeguards of the Bankruptcy Code.

As a practical matter, the financial distress requirement plays a critical gatekeeping role to prevent mass tort defendants from using bankruptcy as an escape hatch from multidistrict litigation (MDL) that is not going their way. But the decision below invites *distress-free bankruptcy*: the use of Chapter 11 by solvent entities to obtain bankruptcy's procedural leverage without the predicate of financial distress. This Court should bring the Fourth Circuit into line with the other Circuits and prevent healthy companies from using bankruptcy tactically to undercut mass tort victims' ability to seek recovery for their injuries in court.

ARGUMENT

I. Distress-Free Bankruptcy Allows Mass Tort Defendants To Forum Shop

Since the Multidistrict Litigation Act was adopted in 1968, mass tort cases in the federal courts have been centralized in MDL. Often working cooperatively with state judges handling parallel litigation, MDL judges have successfully managed the vast majority of those mass tort controversies to comprehensive resolution.²

² See D. Theodore Rave, *Bankruptcy v. Multidistrict Litigation for Mass Torts*, 114 CALIF. L. REV. manuscript at 25–34 (forthcoming 2026).

Mass tort MDLs are overseen by judges who have been handpicked by the Judicial Panel on Multidistrict Litigation (JPML) for their skill in judicial management and willingness to take on the litigation (no judge is forced to accept an MDL assignment). As a result, there is no opportunity for forum shopping by either plaintiffs or defendants. The parties can try to persuade the JPML to choose their preferred transferee district or judge. But a neutral body, the JPML, decides where to create the MDL and chooses the district judge best suited to handle the particular litigation. Studies have shown that when the parties agree on a preferred transferee district, the JPML usually picks that one, and when they disagree, the JPML sides with plaintiffs and defendants roughly equally.³

However, a bankruptcy petition increases mass tort defendants' leverage because defendants filing for Chapter 11 enjoy a virtually unlimited choice of venue under 28 U.S.C. § 1408. This is because corporate debtors can reincorporate in their preferred jurisdiction shortly before filing.⁴ In this case, for example, Bestwall was formed as a special purpose Texas limited liability company to take on all of Georgia Pacific's asbestos liability under Texas's divisional merger statute. But then Bestwall changed its domicile to North Carolina shortly before filing for

³ See Zachary D. Clopton & Andrew D. Bradt, *Party Preferences in Multidistrict Litigation*, 107 CALIF. L. REV. 1713 (2019).

⁴ See, e.g., Adam J. Levitin, *Judge Shopping in Chapter 11 Bankruptcy*, 2023 U. ILL. L. REV. 351; cf. Steve Vladeck, "The Growing Abuse of Single-Judge Districts," *One First* (Mar. 13, 2023).

bankruptcy, specifically to take advantage of Fourth Circuit precedent.⁵

II. Distress-Free Bankruptcy Allows Defendants To Stay All Litigation

Filing under Chapter 11 automatically stays all litigation against the debtor, pursuant to 11 U.S.C. § 362(a), and bankruptcy courts are often willing to enter preliminary injunctions effectively extending the reach of that stay to the debtor’s affiliated companies.⁶ Stays and injunctions remove plaintiffs’ biggest source of leverage in mass tort litigation—the threat of jury trials and verdicts. Although mass tort litigation nearly always ends in settlement,⁷

⁵ See *In re Bestwall LLC*, 605 B.R. 43, 51 (Bankr. W.D.N.C. 2019).

⁶ See, e.g., *In re Bestwall LLC*, 606 B.R. 243, 254–58 (Bankr. W.D.N.C. 2019); *In re Aldrich Pump LLC*, No. 20-30608, 2021 WL 3729335, at *33, *38 (Bankr. W.D.N.C. Aug. 20, 2021); see also Melissa B. Jacoby, *Sorting Bugs and Features of Mass Tort Bankruptcy*, 101 TEX. L. REV. 1745, 1762–63 (2023) (noting that large corporate debtors “have obtained nationwide injunctions going well beyond the automatic stay’s protection” and which “sometimes are extended for years”).

⁷ More than 99% of cases in federal court are resolved before trial. Admin. Off. U.S. Cts., Table C-4—U.S. District Courts—Civil Cases Terminated, by Nature of Suit and Action Taken—During the 12-Month Period Ending June 30, 2022, U.S. Courts: Statistical Tables for the Federal Judiciary (Jun. 30, 2022), <https://www.uscourts.gov/statistics/table/c-4/statistical-tables-federal-judiciary/2022/06/30>. And more than 97% of MDL cases are resolved in the MDL district either by motion or, more frequently, settlement. See, e.g., Thomas H.L. Forster, Note, *Out of the Black Hole: Toward a New Approach to MDL Procedure*, 100 TEX. L. REV. 1227, 1228 (2022).

bargaining over the terms of those settlements takes place in the shadow of litigation. And plaintiffs' ability to push their cases forward toward trial is their biggest stick. The automatic stay takes that stick away and places total control over the pace of the litigation in the hands of the bankruptcy judge.⁸

III. Distress-Free Bankruptcy Allows Defendants To Impose Resolution On Even Plaintiffs With the Strongest Claims

Another significant source of mass tort defendant leverage in bankruptcy is the power to impose resolution over the objection of even plaintiffs with the strongest claims and most severe injuries—those that have the highest value in the tort system. Debtors in Chapter 11 bankruptcy presumptively enjoy the exclusive right to propose a reorganization plan⁹ and—if the plan is confirmed after a vote by the tort creditors and meets other statutory requirements—the ability to bind nonconsenting claimants to that plan.¹⁰

⁸ See, e.g., Daniel J. Bussel, *The Mass Tort Claimants' Bargain*, 97 AM. BANKR. L.J. 684, 713–14 (2023).

⁹ Debtors have the exclusive right to propose a reorganization plan of reorganization for four months after filing a petition, which can be extended to eighteen months. 11 U.S.C. § 1121(b); see also *id.* § 1121(d)(2)(A).

¹⁰ See Troy A. McKenzie, *Toward A Bankruptcy Model for Nonclass Aggregate Litigation*, 87 N.Y.U. L. REV. 960, 1002–08 (2012).

In theory, voting is tort claimants' main protection in a mass tort bankruptcy,¹¹ but in practice mass tort defendants can skew bankruptcy voting procedures sharply in their favor. The resolution of the plaintiffs' claims will be negotiated in the shadow of those voting rules, not the threat of trial by the strongest claims.

One way that mass tort defendants can skew bankruptcy voting procedures is by allocating voting rights to give the weakest claims the same voting power as the strongest. In a mass tort, the value of victims' claims can vary widely along many dimensions (e.g., degree of injury, evidence of causation, applicable state law, etc.). But determining the valuation of each tort claim can be difficult and costly. As a result, bankruptcy courts tend to lump all tort claimants into a single creditor class¹² and estimate the value of their claims uniformly at \$1 for voting purposes.¹³ The "one dollar, one vote" method

¹¹ *In re LTL Mgmt., LLC*, 637 B.R. 396, 416 (Bankr. D.N.J. 2022), *rev'd and remanded*, 58 F.4th 738 (3d Cir. 2023), and *rev'd and remanded*, 64 F.4th 84 (3d Cir. 2023).

¹² In theory, the bankruptcy rules allow judges to separate tort claimants into different voting classes based on the relative value of their claims. Fed. R. Bankr. P. 3013. But, as Bussel has explained, this classification approach "is virtually never used." Bussel, *supra* note 5, at 726.

¹³ See, e.g., *In re Dow Corning Corp.*, 211 B.R. 545, 573 (Bankr. E.D. Mich. 1997); *Menard-Sanford v. Mabey (In re A.H. Robins Co.)*, 880 F.2d 694, 696 (4th Cir. 1989); Jacoby, *supra* n.6, at 1756–57 (noting ubiquity of this practice).

of estimation creates a serious risk of undervaluing the strongest claims.¹⁴

Even worse, uniform valuation of claims for voting purposes encourages the filing of meritless claims in bankruptcy by plaintiffs who would never have recovered in the tort system, but who will be content to accept a lowball bankruptcy plan that pays them something. Some lawyers may recruit numerous weak or meritless claims to file in the bankruptcy, giving themselves control of a large voting bloc in negotiations. They may then offer these votes to the debtor in support of a lowball plan of reorganization that systematically undercompensates claimants with serious injuries.

Indeed, the defendant may actively solicit the cooperation of plaintiffs' lawyers to drum up weak claims and allow the defendant to stuff the ballot box with votes in favor of a plan opposed by stronger claims.¹⁵ Unlike an MDL, where the defendant has every incentive to try to screen out as many claims as possible, once in bankruptcy, the debtor might welcome the deluge and work with a hand-picked subset of plaintiffs' counsel to design voting

¹⁴ See, e.g., *In re Quigley Co.*, 346 B.R. 647, 659 (Bankr. S.D.N.Y. 2006).

¹⁵ See, e.g., Adam Levitin, *Stuffing the Chapter 11 Ballot Box with "Junk" Claims*, CREDIT SLIPS (Apr. 26, 2024), <https://www.creditslips.org/creditslips/2024/04/stuffing-the-chapter-11-ballot-box-with-junk-claims>.

procedures that minimize screening of predictably friendly votes.¹⁶

In addition, bankruptcy shifts control over the terms of aggregation to mass tort defendants. Both MDL and bankruptcy provide for aggregation of claims, but they operate very differently. MDL enables tort claimants and their lawyers to aggregate on their own terms, while bankruptcy empowers the defendant to impose aggregate resolution unilaterally.¹⁷ Claimants face the risk that the debtor will be permitted to delay payments until it establishes a bankruptcy trust, which could then pay claimants less than they would be awarded in the tort system. And if individual claimants do not like the terms of the deal, they typically cannot opt out of the plan of reorganization; they can only pursue their claims against the trust where their recoveries are likely to be capped.¹⁸ These features make bankruptcy particularly attractive to mass tort defendants, even if they can pay their bills on time.¹⁹

¹⁶ *In re Red River Talc LLC*, 670 B.R. 251 (Bankr. S.D. Tex. March 31, 2025).

¹⁷ See D. Theodore Rave, *Bankruptcy v. Multidistrict Litigation*, 114 CALIF. L. REV. manuscript at 51–53 (forthcoming 2026), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=5140220.

¹⁸ See, e.g., Ralph Brubaker, *Mass Torts, the Bankruptcy Power, and Constitutional Limits on Mandatory No-Opt-Out Settlements*, 23 FLA. ST. U. BUS. REV. 111, 119–20 (2024).

¹⁹ See Andrew D. Bradt, Zachary D. Clopton & D. Theodore Rave, *MDL Strikes Back*, 110 CORNELL L. REV. __ (forthcoming 2026), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=5389495.

IV. The Texas Two-Step Further Allows A Debtor And Its Corporate Affiliates To Circumvent The Fundamental Safeguards Of The Bankruptcy Code

The so-called “Texas Two-Step” further exacerbates the imbalance between mass tort defendants and plaintiffs. In a Two-Step bankruptcy, the mass tort defendant divides itself into two new companies: a “GoodCo” with all of the assets, and a “BadCo” with all of the tort liability plus a funding guarantee from the GoodCo. The BadCo then files for bankruptcy while the GoodCo continues business as usual outside of bankruptcy.²⁰ This Two-Step maneuver allows a debtor and its corporate affiliates to circumvent fundamental safeguards of the Bankruptcy Code.

The Code vests bankruptcy courts with the power to control the debtor’s business and assets through appointment of a trustee and review of transactions. *See, e.g.*, 11 U.S.C. §§ 363, 1104(a). However, under the Two-Step, a corporate parent can keep its operating assets outside the bankruptcy court’s supervision by allocating them to a sibling entity instead of the debtor. The Two-Step thus hinders the bankruptcy system’s ability to control the assets that gave rise to the tort liabilities in the first place—and the assets available to satisfy those liabilities. The Two-Step also allows a debtor to ensure that tort victims are the only creditors subject to bankruptcy, while providing that trade creditors

²⁰ *See* Michael A. Francus, *Texas Two-Stepping Out of Bankruptcy*, 120 MICH. L. REV. 38 (2022).

remain outside bankruptcy and have their claims satisfied in full as they become due.

From the debtor's perspective, the Two-Step eliminates many of the disincentives to filing for bankruptcy. Bankruptcy can be a painful process for the debtor, which must endure disclosure requirements, judicial oversight, and the inevitable reputational hit of a Chapter 11 filing. Ordinarily, a solvent debtor whose managers still have a duty of loyalty to the shareholders will have an incentive to put enough money on the table to secure the tort claimants' votes and end the ordeal quickly. But because the BadCo debtor in a Two-Step bankruptcy has no operations of which to speak (other than seeking to cap liability for the tort claims), there is no pain to prolong. Professional fees in bankruptcy can be high, but they are easily dwarfed by the money the defendant is *not* spending on litigation costs and judgments in the tort system.²¹ Tort claimants, by contrast, need to bring the bankruptcy to a close before they see any money. This combination further shifts significant leverage from mass tort plaintiffs to defendants and can result in an extended period in which the debtor can effectively tranquilize tort claims. For example, the instant case has been stalled in bankruptcy since 2017.

²¹ See *In re Aldrich Pump LLC*, No. 20-30608, 2023 WL 9016506, at *10 & n.13 (Bankr. W.D.N.C. Dec. 28, 2023) (noting that “for the past three years, Debtors and the Affiliates have enjoyed . . . a ‘payment holiday’ from the \$100 million-a-year costs they were previously incurring”)

CONCLUSION

The decision of the court below runs counter to the principle at the heart of bankruptcy theory: that bankruptcy exists for the benefit of creditors, not just the debtor.²² Bankruptcy makes sense when the defendant cannot afford to pay all of its creditors—even if it necessarily curtails plaintiffs’ procedural abilities, rights, and leverage.

However, when a defendant is *not* bankrupt (neither insolvent nor even financially distressed), there is no reason to allow a defendant to unilaterally avail itself of bankruptcy protections to torpedo a plaintiffs’ ability to negotiate a resolution via MDL. For all these reasons, enforcing the financial distress requirement is imperative.

The Petition for Writ of Certiorari should be granted.

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²² See *Conner v. Long*, 104 U.S. 228, 232 (1881); see also Thomas H. Jackson, *THE LOGIC AND LIMITS OF BANKRUPTCY LAW* (1986).