



State of New Jersey
DEPARTMENT OF COMMUNITY AFFAIRS
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PHILIP D. MURPHY
Governor

LT. GOVERNOR SHEILA Y. OLIVER
Commissioner

FINAL DECISION

April 28, 2020 Government Records Council Meeting

Luis Rodriguez
Complainant

Complaint No. 2018-215

v.

Kean University
Custodian of Record

At the April 28, 2020 public meeting, the Government Records Council (“Council”) considered the April 21, 2020 Findings and Recommendations of the Executive Director and all related documentation submitted by the parties. The Council voted unanimously to adopt the entirety of said findings and recommendations. The Council, therefore, finds that:

1. The Custodian has borne her burden of proof that she timely responded to the Complainant’s August 23, 2018 OPRA request. N.J.S.A. 47:1A-5(g), N.J.S.A. 47:1A-5(i). As such, no “deemed” denial of access occurred here. N.J.S.A. 47:1A-6.
2. The Custodian has borne her burden of proof that she timely responded to the Complainant’s September 6, 2018 OPRA request. N.J.S.A. 47:1A-6. The Custodian’s extensions of time to respond to the Complainant’s request were reasonable and not unduly excessive based upon to the totality of the circumstances. N.J.S.A. 47:1A-5(g) and N.J.S.A. 47:1A-5(i). See also Ciccarone v. N.J. Dep’t of Treas., GRC Complaint No. 2013-280 (Interim Order dated July 29, 2014); Werner v. N.J. Civil Serv. Comm’n, GRC Complaint No. 2011-151 (December 2012); and Rodriguez v. Kean Univ., GRC Complaint No. 2016-87 (April 2018).
3. The Custodian did not unlawfully deny access to the Complainant’s September 6, 2018 OPRA request. N.J.S.A. 47:1A-6. Specifically, the Custodian certified, and the record reflects, that she disclosed responsive records to the request. Danis v. Garfield Bd. of Educ. (Bergen), GRC Complaint Nos. 2009-156, *et seq.* (Interim Order dated April 28, 2010); and Burns v. Borough of Collingswood, GRC Complaint No. 2005-68 (September 2005).

This is the final administrative determination in this matter. Any further review should be pursued in the Appellate Division of the Superior Court of New Jersey within forty-five (45) days. Information about the appeals process can be obtained from the Appellate Division Clerk’s Office, Hughes Justice Complex, 25 W. Market St., PO Box 006, Trenton, NJ 08625-0006. Proper service of submissions pursuant to any appeal is to be made to the Council in care of the Executive Director at the State of New Jersey Government Records Council, 101 South Broad Street, PO Box 819, Trenton, NJ 08625-0819.



Final Decision Rendered by the
Government Records Council
On The 28th Day of April 2020

Robin Berg Tabakin, Esq., Chair
Government Records Council

I attest the foregoing is a true and accurate record of the Government Records Council.

Steven Ritardi, Esq., Secretary
Government Records Council

Decision Distribution Date: April 30, 2020

**STATE OF NEW JERSEY
GOVERNMENT RECORDS COUNCIL**

**Findings and Recommendations of the Executive Director
April 28, 2020 Council Meeting**

**Luis Rodriguez¹
Complainant**

GRC Complaint No. 2018-215

v.

**Kean University²
Custodial Agency**

Records Relevant to Complaint:

August 23, 2018 OPRA Request: Electronic copies via e-mail of: “As part of the Council for the Accreditation of Educator Preparation (“CAEP”) accreditation process in 2017, the CAEP raised concerns about the Educational Leadership Program. A response to those concerns was written in 2017. I request a copy of that response and the CAEP document to which the response was written.”

September 6, 2018 OPRA Request: Electronic copies via e-mail of:

1. Document referenced in May 24, 2017 e-mail from Rafael Inoa (Educational Leadership – MA report);
2. Document referenced in May 17, 2017 e-mail from Stephanie McGowan (SPA report for Educational Leadership Program);
3. Final CAEP report sent to Kean University (“Kean”) on any and all educational programs and documents written in response to the CAEP report;
4. All correspondence (including attachments) between the CAEP senior director of program review (Banhi Bhattacharya) and any member of any education program at Kean. I seek such correspondence from January 1, 2017 to the present.

Custodian of Record: Laura Barkley-Haelig

Request Received by Custodian: August 23, 2018; September 6, 2018

Response Made by Custodian: September 5, 2018; September 17, 2018; October 1, 2018

GRC Complaint Received: October 4, 2018

¹ No legal representation listed on record.

² Represented by Kraig M. Dowd, Esq. of Weber Dowd Law, LLC (Woodland Park, NJ).

Background³

August 23, 2018 Request and Response:

On August 23, 2018, the Complainant submitted an Open Public Records Act (“OPRA”) request to the Custodian seeking the above-mentioned records. On September 5, 2018, the Custodian responded in writing via e-mail, stating that the request was overly broad and would require Kean to conduct research to locate responsive records. The Custodian stated that the request did not specify a record type or sender/recipient, but instead requested a response to unspecified “concerns,” and a copy of a document containing those “concerns.” The Custodian also stated that if the Complainant wished to amend and resubmit the request, he should do so with more specificity as to the record type, sender/recipient, and the content and/or subject matter of the records.

September 6, 2018 Request:

On September 6, 2018, the Complainant submitted an OPRA request to the Custodian seeking the above-mentioned records.⁴ The Complainant stated that the request was a clarification of the August 23, 2018 OPRA request. On September 17, 2018, the Custodian responded in writing, advising that a time extension until October 1, 2018 was necessary to process the OPRA request appropriately. On October 1, 2018, the Custodian responded in writing stating that an additional time extension until October 15, 2018 was necessary to process the OPRA request appropriately.

Denial of Access Complaint:

On October 4, 2018, the Complainant filed a Denial of Access Complaint with the Government Records Council (“GRC”). The Complainant asserted that the Custodian violated OPRA by continuously extending the time to respond to his September 6, 2018 OPRA request. The Complainant asserted that the Custodian failed to provide a valid or legal response to his request. The Complainant also asserted that the Custodian failed to respond or seek an extension of time to his August 23, 2018 OPRA request, in violation of OPRA.

The Complainant also included a copy of an e-mail dated September 19, 2018. Therein, the Complainant expressed his wish to withdraw consent to a litigation settlement agreement he had negotiated with Kean. The Complainant also stated that the basis for withdrawal was Kean’s failure to uphold the terms of the agreement by not listing records withheld in their entirety in response to a request for CAEP records (“Litigation Request”).

³ The parties may have submitted additional correspondence or made additional statements/assertions in the submissions identified herein. However, the Council includes in the Findings and Recommendations of the Executive Director the submissions necessary and relevant for the adjudication of this complaint.

⁴ The Complainant submitted three (3) separate e-mails seeking records on September 6, 2018, and the Custodian consolidated them into a single OPRA request.

September 6, 2018 Supplemental Responses:

On October 9, 2018, the Custodian sent an e-mail to the Complainant, stating that Kean received the Complainant's Denial of Access Complaint. The Custodian stated that in response to the Complainant's claim that Kean failed to respond to his August 23, 2018 OPRA request, she attached a copy of the disposition letter sent on September 5, 2018. The Custodian also stated that she wished for the Complainant to withdraw that portion of the complaint.

On October 9, 2018, the Complainant responded to the Custodian, stating that he located the September 5, 2018 response, but also stated that Kean did not provide any evidence that it provided responsive records. The Complainant stated that the facts within his complaint still demonstrate that Kean failed to respond to the August 23, 2018 request. The Complainant sent another e-mail to the GRC that same day, noting that his August 23, 2018 request was for documents written in response to the CAEP visit, as well as the CAEP accreditation visit report, and not for e-mail correspondence.

On October 12, 2018, the Complainant e-mailed the GRC, forwarding a message he sent to Kean officials pertaining to the accreditation status of Kean's Leadership Education program. The Complainant stated that the program's status may have been the reason Kean had not yet provided responsive records.

On October 15, 2018, the Custodian responded to the Complainant in writing stating that an additional time extension until October 29, 2018 was necessary to process the OPRA request.

On October 26, 2018, the Complainant e-mailed the GRC, stating that he received records from Kean that were responsive to the Litigation Request referenced in his complaint. The Complainant stated that the records were also responsive to his August 23, 2018 OPRA request. The Complainant stated that there was convincing evidence that Kean knowingly and willfully violated OPRA by not providing him with these records in response to the settlement agreement and the August 23, 2018 request. That same day, the Complainant submitted another e-mail to the GRC, providing an excerpt of the Custodian's Counsel's cover letter⁵ attached to the responsive records. The Complainant stated that he was challenging the stated claim that the greater specificity of his OPRA request⁶ was the reason Kean located additional records. The Complainant stated that the records he received were e-mail correspondence that should not have been difficult to locate.

On October 29, 2018, the Custodian responded to the Complainant in writing stating that an additional time extension until November 12, 2018 was necessary to process the OPRA request.

On November 2, 2018, the Custodian responded to the Complainant in writing, stating that there were a total of twenty-six (26) pages of records responsive to Item Nos. 1 and 2. The Custodian also stated that there were three (3) pages of records responsive to Item No. 3, but added that there were no responsive records to the portion seeking "documents written in response to the

⁵ Neither the Complainant nor the Custodian included a complete copy of the referenced correspondence within their respective filings.

⁶ It is unclear in the record whether the Complainant was referring to his August 23, 2018 OPRA request or the September 6, 2018 OPRA request.

final CAEP report.” The Custodian then stated that there were 144 pages of responsive records to Item No. 4.

Statement of Information:

On November 2, 2018, the Custodian filed a Statement of Information (“SOI”). The Custodian certified that she received the Complainant’s OPRA requests on August 23, 2018 and September 6, 2018, respectively. The Custodian certified that the Complainant’s August 23, 2018 OPRA request was reminiscent of the Litigation Request the Complainant referenced in his complaint. The Custodian certified that said litigation was settled on August 22, 2018. The Custodian certified that upon review from legal counsel, she determined that the August 23, 2018 OPRA was invalid. The Custodian certified that she responded to the Complainant’s August 23, 2018 OPRA request in writing on September 5, 2018, stating that the request was invalid as overly broad and suggested that the Complainant resubmit a clarified request.

The Custodian certified that upon receiving the September 6, 2018 OPRA request, same was forwarded to legal counsel for review. The Custodian certified that the September 17, 2018 time extension request letter was sent to the Complainant because the OPRA request was still being reviewed by legal counsel. The Custodian then certified that the request was forwarded to the Office of Record. The Custodian certified that an additional extension letter was sent on October 1, 2018 as the Office of Record was still reviewing the request. The Custodian certified that at a meeting held on October 9, 2018, each portion of the request was addressed, and her office received 100 pages of responsive e-mails. The Custodian certified that an additional extension was sent on October 15, 2018, and a status update sent to the Office of Record on October 17, 2018. The Custodian certified that the Office of Record informed her that the search for any and all responsive documents was ongoing.

The Custodian certified that upon inspection of the e-mails received on October 9, 2018, she determined that some were responsive to the Litigation Request and were disclosed to the Complainant on October 25, 2018. The Custodian certified that a final extension letter was sent on October 29, 2018, and additional responsive records were sent to the Office of Human Resources on October 30, 2018 for review. The Custodian then certified that all outstanding responsive records were sent to the Office of Human Resources on November 1, 2018. The Custodian certified that she responded to the Complainant’s September 6, 2018 OPRA request in writing on November 2, 2018, providing responsive records to each request item.

The Custodian asserted that she timely responded to the Complainant’s August 23, 2018 OPRA request and lawfully extended the time to respond to the September 6, 2018 OPRA request. The Custodian asserted that instead of contacting the Custodian directly to address concerns regarding the extensions, the Complainant elected to file the instant complaint.

The Custodian asserted that given the similarity between the Litigation Request and the requests at issue, the receipt, review, comparison, processing, and disposition of the requests were reasonable under OPRA. The Custodian asserted that extensions under OPRA are appropriate under certain circumstances, and that extensions “reflect the Legislature’s intention to balance the requestor’s interest in prompt access to identifiable records and the operational needs of

government.” N.J. Builders Ass’n v. N.J. Council on Affordable Hous., 390 N.J. Super. 166, 180 (App. Div.), certif. denied, 190 N.J. 394 (2007). The Custodian contended that while extension letters were sent to the Complainant, she worked with legal counsel and the Office of Record to identify and review potentially responsive records. The Custodian asserted that she ensured that an exhaustive records search was completed prior to finalizing a response.

Additional Submissions:

On November 5, 2018, the Complainant submitted a response to the Custodian’s SOI. The Complainant asserted that he did not recall receiving a response to his August 23, 2018 OPRA request, and requested a copy of same via e-mail.

On December 14, 2018, the Complainant e-mailed the GRC, asserting that Kean provided him with six (6) records pertaining to Kean’s College of Education and Education Leadership programs that day in response to separate OPRA requests dated December 12, 2018. The Complainant stated that the requests sought records attached to e-mail correspondence dated in October 2018 and November 2018. The Complainant asserted that according to the records, the programs in question were not re-accredited, and claimed that Kean would have been embarrassed if such information was publicized. The Complainant then asked the GRC to consider Kean’s motivation for not providing all documents related to the request.

Analysis

Timeliness

OPRA mandates that a custodian must either grant or deny access to requested records within seven (7) business days from receipt of said request. N.J.S.A. 47:1A-5(i). A custodian’s failure to respond within the required seven (7) business days results in a “deemed” denial. Id. Further, a custodian’s response, either granting or denying access, must be in writing pursuant to N.J.S.A. 47:1A-5(g).⁷ Thus, a custodian’s failure to respond in writing to a complainant’s OPRA request either granting access, denying access, seeking clarification or requesting an extension of time within the statutorily mandated seven (7) business days results in a “deemed” denial of the complainant’s OPRA request pursuant to N.J.S.A. 47:1A-5(g), N.J.S.A. 47:1A-5(i), and Kelley v. Twp. of Rockaway, GRC Complaint No. 2007-11 (Interim Order dated October 31, 2007).

August 23, 2018 Request

The Complainant asserted that the Custodian failed to provide a response to his OPRA request. Shortly after the Complainant filed his complaint, the Custodian sent an e-mail to the Complainant on October 9, 2018, asserting that a response was provided on September 5, 2018. In the SOI, the Custodian certified that she responded to the Complainant’s request in writing on September 5, 2018, denying access to the request as invalid and advised the Complainant to clarify his request. The Custodian included in her SOI a copy of the response dated September 5, 2018.

⁷ A custodian’s written response either granting access, denying access, seeking clarification or requesting an extension of time within the statutorily mandated seven (7) business days, even if said response is not on the agency’s official OPRA request form, is a valid response pursuant to OPRA.

A review of the evidence supports a finding that the Custodian did not violate OPRA's response time provisions. Specifically, the Custodian timely responded to the Complainant's request on September 5, 2018 via e-mail, stating that the request was invalid. The record indicates that the Complainant acknowledged receipt of this correspondence and submitted his clarified September 6, 2018 OPRA request, directly replying to the Custodian's response e-mail. Furthermore, on October 9, 2018 the Complainant acknowledged that he located the Custodian's response.

Therefore, the Custodian has borne her burden of proof that she timely responded to the Complainant's August 23, 2018 OPRA request. N.J.S.A. 47:1A-5(g), N.J.S.A. 47:1A-5(i). As such, no "deemed" denial of access occurred here. N.J.S.A. 47:1A-6.

September 6, 2018 Request

In Rivera v. City of Plainfield Police Dep't (Union), GRC Complaint No. 2009-317 (May 2011), the custodian responded in writing to the complainant's request on the fourth (4th) business day by seeking an extension of time to respond and providing an anticipated date by which the requested records would be made available. The complainant did not consent to the custodian's request for an extension of time. The Council stated that:

The Council has further described the requirements for a proper request for an extension of time. Specifically, in Starkey v. N.J. Dep't of Transp., GRC Complaint Nos. 2007-315, 2015-216, and 2015- 317 (February 2009), the Custodian provided the Complainant with a written response to his OPRA request on the second (2nd) business day following receipt of said request in which the Custodian requested an extension of time to respond to said request and provided the Complainant with an anticipated deadline date upon which the Custodian would respond to the request. The Council held that "because the Custodian requested an extension of time in writing within the statutorily mandated seven (7) business days and provided an anticipated deadline date of when the requested records would be made available, the Custodian properly requested said extension pursuant to N.J.S.A. 47:1A-5(g) [and] N.J.S.A. 47:1A-5(i).

Further, in Criscione v. Town of Guttenberg (Hudson), GRC Complaint No. 2010-68 (November 2010), the Council held that the custodian did not unlawfully deny access to the requested records, stating in pertinent part that:

[B]ecause the Custodian provided a written response requesting an extension on the sixth (6th) business day following receipt of the Complainant's OPRA request and providing a date certain on which to expect production of the records requested, and, notwithstanding the fact that the Complainant did not agree to the extension of time requested by the Custodian, the Custodian's request for an extension of time [to a specific date] to respond to the Complainant's OPRA request was made in writing within the statutorily mandated seven (7) business day response time.

Moreover, in Werner v. N.J. Civil Serv. Comm'n, GRC Complaint No. 2011-151 (December 2012), the Council again addressed whether the custodian lawfully sought an extension of time to respond to the complainant's OPRA request. The Council concluded that because the custodian requested an extension of time in writing within the statutorily mandated seven (7) business days and provided an anticipated date by which the requested records would be made available, the custodian properly requested the extension pursuant to OPRA. See also Rivera, GRC 2009-317; Criscione, GRC 2010-68; and Starkey, GRC 2007-315, *et seq.*

Although extensions are rooted in well-settled case law, the Council need not find valid every request for an extension containing a clear deadline. In Ciccarone v. N.J. Dep't of Treas., GRC Complaint No. 2013-280 (Interim Order dated July 29, 2014), the Council found that the custodian could not lawfully exploit the process by repeatedly rolling over an extension once obtained. In reaching the conclusion that the continuous extensions resulted in a "deemed" denial of access, the Council looked to what is "reasonably necessary."

In the instant matter, the Custodian sought multiple extensions for the Complainant's September 6, 2018 OPRA request as follows:

Date of Request for Extension	New Deadline for Response	Reason for Extension
September 17, 2018	October 1, 2018	So that the OPRA request may "be appropriately processed."
October 1, 2018	October 15, 2018	So that the OPRA request may "be appropriately processed."
October 15, 2018	October 29, 2018	So that the OPRA request may "be appropriately processed."
October 29, 2018	November 12, 2018	So that the OPRA request may "be appropriately processed."

The Custodian extended the response time on four (4) occasions for a total of approximately thirty-eight (38) business days.⁸ As noted above, a requestor's approval is not required for a valid extension. However, it should be noted that the Complainant did not object to any extension prior to filing this complaint.

To determine if the extended time for a response is reasonable, the GRC must first consider the complexity of the request as measured by the number of items requested, the ease in identifying and retrieving requested records, and the nature and extent of any necessary redactions. Ciccarone, GRC 2013-280. The GRC must next consider the amount of time the custodian already had to respond to the request. Id. Finally, the GRC must consider any extenuating circumstances that could hinder the custodian's ability to respond effectively to the request.⁹ Id.

⁸ The total number is notwithstanding any closures or holidays that might have occurred during the time frame.

⁹ "Extenuating circumstances" could include, but not necessarily be limited to, retrieval of records that are in storage or archived (especially if located at a remote storage facility), conversion of records to another medium to accommodate the requestor, emergency closure of the custodial agency, or the custodial agency's need to reallocate resources to a higher priority due to *force majeure*.

Here, the Complainant's September 6, 2018 OPRA request sought correspondence and reports pertaining to the accreditation review and status of various educational programs at Kean. The Complainant referenced documents and reports mentioned within specific e-mails, clarifying his August 23, 2018 request. The Complainant also requested e-mails between Kean's CAEP director and "any member of any education program at Kean" during a twenty (20) month period. The Custodian argued in the SOI that the extensions were necessary to review the instant request along with the Litigation Request, because they were similar, and to conduct an exhaustive search to ensure that all responsive records were located. Additionally, the Custodian described the efforts to consult with each relevant agency to locate responsive records and ensure the response's completeness.

In determining whether the extensions were ultimately unreasonable, the GRC looks to its prior decision in Rodriguez v. Kean Univ., GRC Complaint No. 2016-87 (April 2018) for comparison. In that case, the Council held that the Complainant's request for "Public Access Files" held by Kean warranted an extension of forty-four (44) business days, as the request produced 437 pages of records that needed to be reviewed for potential redactions. The Council held that the extensions were not unduly excessive based on the totality of the circumstances.

In reviewing the evidence, the GRC finds the facts on par with Rodriguez, GRC 2016-86. Although the scope of the instant request was smaller than Rodriguez, the Custodian here certified that the request produced 173 pages of records. Additionally, the Custodian adequately described the efforts to locate and review the records with the relevant agencies and counsel prior to delivery. Combined with the added efforts needed to compare this request with the Litigation Request and develop a complete response, the total time extension of thirty-eight (38) business days was not unreasonable.

Therefore, the Custodian has borne her burden of proof that she timely responded to the Complainant's September 6, 2018 OPRA request. N.J.S.A. 47:1A-6. The Custodian's extensions of time to respond to the Complainant's request were reasonable and not unduly excessive based upon the totality of the circumstances. N.J.S.A. 47:1A-5(g) and N.J.S.A. 47:1A-5(i). See also Ciccarone, GRC 2013-280; Werner, GRC 2011-151; and Rodriguez, GRC 2016-86.

Unlawful Denial of Access

OPRA provides that government records made, maintained, kept on file, or received by a public agency in the course of its official business are subject to public access unless otherwise exempt. N.J.S.A. 47:1A-1.1. A custodian must release all records responsive to an OPRA request "with certain exceptions." N.J.S.A. 47:1A-1. Additionally, OPRA places the burden on a custodian to prove that a denial of access to records is lawful pursuant to N.J.S.A. 47:1A-6.

In Danis v. Garfield Bd. of Educ. (Bergen), GRC Complaint Nos. 2009-156, *et seq.* (Interim Order dated April 28, 2010), the Council found that the custodian did not unlawfully deny access to the requested records based on the custodian's certification that all such records were provided to the complainant. The Council held that the custodian's certification, in addition to the lack of refuting evidence from the complainant, was enough to meet the custodian's burden of

proof. See also Burns v. Borough of Collingswood, GRC Complaint No. 2005-68 (September 2005); Holland v. Rowan Univ., GRC Complaint No. 2014-63, *et seq.* (March 2015).

In the instant matter, the Complainant contended that the records provided in response to his December 12, 2018 OPRA requests should have been provided in response to the OPRA requests at issue. However, the Complainant's September 6, 2018 OPRA request sought records dated between January 1, 2017 and September 6, 2018, the date of the request. In contrast, Complainant's December 12, 2018 OPRA requests sought documents attached to specifically identified e-mails dated in October 2018 and November 2018, which were outside the requested period. Thus, the GRC is satisfied that the Custodian met her burden of proof that no unlawful denial of access occurred.

Accordingly, the Custodian did not unlawfully deny access to the Complainant's September 6, 2018 OPRA request. N.J.S.A. 47:1A-6. Specifically, the Custodian certified, and the record reflects, that she disclosed all responsive records to the request. Danis, GRC 2009-156, *et seq.*; and Burns, GRC 2005-68.

Conclusions and Recommendations

The Executive Director respectfully recommends the Council find that:

1. The Custodian has borne her burden of proof that she timely responded to the Complainant's August 23, 2018 OPRA request. N.J.S.A. 47:1A-5(g), N.J.S.A. 47:1A-5(i). As such, no "deemed" denial of access occurred here. N.J.S.A. 47:1A-6.
2. The Custodian has borne her burden of proof that she timely responded to the Complainant's September 6, 2018 OPRA request. N.J.S.A. 47:1A-6. The Custodian's extensions of time to respond to the Complainant's request were reasonable and not unduly excessive based upon to the totality of the circumstances. N.J.S.A. 47:1A-5(g) and N.J.S.A. 47:1A-5(i). See also Ciccarone v. N.J. Dep't of Treas., GRC Complaint No. 2013-280 (Interim Order dated July 29, 2014); Werner v. N.J. Civil Serv. Comm'n, GRC Complaint No. 2011-151 (December 2012); and Rodriguez v. Kean Univ., GRC Complaint No. 2016-87 (April 2018).
3. The Custodian did not unlawfully deny access to the Complainant's September 6, 2018 OPRA request. N.J.S.A. 47:1A-6. Specifically, the Custodian certified, and the record reflects, that she disclosed responsive records to the request. Danis v. Garfield Bd. of Educ. (Bergen), GRC Complaint Nos. 2009-156, *et seq.* (Interim Order dated April 28, 2010); and Burns v. Borough of Collingswood, GRC Complaint No. 2005-68 (September 2005).

Prepared By: Samuel A. Rosado
Staff Attorney

April 21, 2020