

Brief Services Units: A Preliminary Report

by Amy Mix, Yvonne Tobias, Cecilia Isaacs-Blundin and Jan May¹

Providing legal services to those of limited means is complex. While debates continue to rage regarding the merits of hotlines, *pro se* and other discrete delivery systems, it should come as no surprise to anyone that there is really no one 'delivery system' silver bullet to address the legal problems of our clients and the client community. Instead, to meet the varied needs of clients in an effective manner requires the provision of a continuum of services involving a series of interdependent systems ideally operating in a seamless fashion.

The effectiveness of any one delivery system in this continuum is not easily or quickly measured. The first hotlines in legal services, for instance, were implemented at Legal Counsel for the Elderly in the mid eighties. It was only until very recently, however, that comprehensive studies were done (the "outcomes studies") which showed the real promise and the real limitations of hotlines as a delivery mechanism.

In 2002, LCE started a Brief Services Unit ('BSU'), staffed with an attorney, paralegal, and volunteers. The BSU is specially designed to free the hotline from handling anything beyond advice; this helps more clients get advice more quickly, and also gives litigators more time to work on in-depth legal matters.

Preliminarily, we have shown various ways that a BSU appears to be effective at least in terms of freeing up hotline staff, making effective use of volunteers, and tackling in effective and high volume fashion, specific areas of law that lend themselves to this kind of delivery mechanism. The remainder of this article will explore our progress to date along these fronts.

As with any legitimate experiment, some of LCE's preliminary findings about BSUs are not surprising, while others are a bit of an eye-opener. Following is a list:

- (1) A BSU should be thoroughly integrated into the rest of the program and should operate seamlessly with a hotline, pro bono project, and staff attorneys. The process of deciding exactly what cases go where, especially in the early stages, involves close interaction among various aspects of a program. Having said that, LCE has found it helpful to have the client sign a separate BSU-specific retainer agreement so that the client is clear about what steps the Brief Services staff will take on his or her behalf.
- (2) Though the legal work is "brief," it is not necessarily "simple." Brief Services can present thorny issues of law with many of the challenges that any other aspect of representation presents. A BSU should be staffed with or supervised by seasoned

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practitioners who can easily identify the issues and any potential consequences of litigation or alternative courses of action.

(3) In-house volunteers working with Brief Services staff can provide valuable assistance on a wide range of Brief Service activities. Trained volunteers supervised by an experienced attorney can effectively interview clients, do fact investigation, write letters, make telephone calls, and develop cases. Experienced volunteers (especially attorney volunteers) can draft pleadings (e.g., small claims), negotiate with third parties, and conduct legal research.

(4) Special systems can be set up effectively to deal with public benefits cases. LCE has devised systems to assist older persons in completing necessary forms for Social Security, such as benefits applications, an overpayment waiver form, or a request for reconsideration.

(5) Special systems can be set up to deal with consumer debt cases. LCE has also worked out an effective system for handling a large volume of consumer debt cases in which bankruptcy is not the best option.

(6) Brief Services staff and volunteers can be used to follow-up on hotline advice or suggested action where the hotline attorney has identified a client who may need further reminders or assistance. Hotline studies have shown that many hotline callers do not follow up on the information or advice given. With a follow-up call, however, LCE has found that the caller is much more likely to follow through.

All the answers to how staff and volunteers specializing in Brief Services cases can improve the effectiveness of a legal services program are not yet resolved. The above findings hold promise, especially by carving out discrete subject areas in which specialized staff is particularly helpful. In hopes that managers across the country can take some of its ideas in order to experiment, LCE has compiled the above ideas as well the following step-by-step accounts of how its BSU handles Social Security Administration, debt collection, and prescription drug assistance.

Legal Counsel for the Elderly's Brief Services Unit at Work:

1. Social Security Administration Assistance

In 2000, LCE created its Hotline Advice Follow Up Program ('HFP'). The HFP gives LCE the ability to use volunteers to measure the effectiveness of advice given by the LCE hotline attorneys. LCE then took its next step: streamlining the client intake process, with the creation of the BSU. Like the HFP, the BSU utilizes non-attorney volunteers who help resolve cases and develop cases to be referred to LCE's Volunteer Lawyer's Project.

In implementing the BSU, LCE found that it could not determine if older District residents' needs were being met by its assistance in public benefit cases, especially Social

Security cases. With the Social Security process averaging 100 days per claim, it was inefficient and costly to allocate paid staff resources to monitor the cases for such an extended time. Monitoring the cases involved making periodic calls to both the Social Security Administration ('SSA') and the client regarding the status of a case. Using the HFP as a model, LCE has created and implemented a new approach in handling Social Security cases.

Under the new approach, Social Security overpayment and disability cases are transferred to the BSU at an early stage by hotline attorneys. A non-attorney volunteer then interviews the client and assists the client in preparing necessary documentation. This includes completion of Request for Waivers, Request for Reconsideration, and applications for benefits. The BSU then closes the case after completion of the documentation. (The BSU also assists clients in the completion of Request for Administrative hearings; however, these cases remain open and are referred to our Volunteer Lawyer's Project for placement with a pro bono attorney.)

LCE understands that the Social Security process can sometimes be a daunting and exasperating experience. As such, LCE foresaw that some clients would not have the ability to pursue a case on their own behalf. Therefore, LCE established criteria in which it would assess a client's ability to pursue his or her case and called upon its non-attorney volunteers to make this assessment. A client's inability to pursue a case might be due to several factors including but not limited to:

- a) inability to read or write
- b) incapacity issues, such as dementia
- c) physical and/or mental impairments that impede the client's ability to interact with the SSA

If evidence shows a client may have difficulty pursuing a case on his/her own behalf, documentation is filed on behalf of the client and the case remains open in the BSU.

If a client is found able to pursue the matter on his/her own behalf, BSU assists the client in completing the documentation, explains the Social Security process to the client, and gives the client the documentation to file on his/her own behalf. If for some reason the client is found to be able to pursue the matter on his/her own behalf but unable to file the necessary documents, BSU will file the documentation on behalf of the client and will send the client a copy of the date stamped document for his/her records. BSU completes the case by sending the client a letter explaining the Social Security process and advising the client to contact LCE if (s)he should receive a denial or if recovery of the overpayment resumes without a decision (Appendix A). BSU then closes the case and "tickles" the case for follow up in 90 days.

If BSU has not heard from the client before the "tickle" date, a BSU volunteer will call the client and complete a Social Security questionnaire developed by LCE (see Appendix B). In developing the Social Security questionnaire, LCE used its questionnaire previously designed for the HFP. The questionnaire was revised so that it would ask specific questions that would track the ability of the client to monitor his/her own case, evaluate the effectiveness of counsel/ advice in Social Security cases, and

determine if the services of a legal service organization (i.e. calling to the Social Security Administration each month) are necessary to expedite the resolution of a case.

The results of LCE's new approach are still being compiled. However, LCE hopes that its new approach of handling Social Security cases in a manner that gives clients an opportunity to pursue matters on their own will become a mechanism that involves clients more in the process; hopefully, this involvement will result in client empowerment and a more cost-efficient methods of delivering services.

2. Debt Collection Assistance

The number of debt collection cases legal service programs handle will likely increase as clients find they are unable to pay mounting debt in today's economy. LCE has found that the Brief Services Unit is well-suited to handle a high volume of these cases. Many prospective clients will approach legal services specifically requesting to declare bankruptcy; however, there are several approaches for working with clients in debt, and the BSU first reviews the client's financial situation in order to determine if another course of action, such as negotiation or "judgment proof" and "cease and desist" letters, that is more appropriate.

While bankruptcy is the ultimate source for discharging debts and ceasing collection attempts, time-intensive bankruptcy cases may unnecessarily drain the already thin resources of legal services offices. As such, all other avenues should be explored before taking steps towards bankruptcy. This section addresses what courses of action are available to advocates representing clients in debt, when those actions should be taken, and how to evaluate a prospective client to determine the course action that will provide the most effective representation. The goal of a legal services office representing clients in debt is to devise a system that best meets the needs of the client, while protecting limited program resources.

Financial Interview

The BSU's first step is to gain a complete understanding of the client's financial circumstances through a financial interview. This intake covers every facet of the client's finances, including all debts owed, all assets owned, and all sources of income. Because financial interviews can be time consuming, BSU volunteers work directly with the client to complete a detailed financial intake form (Appendix C).

After a review of the completed financial intake, BSU staff makes a determination on the appropriate course of action. That determination is made in consideration of many factors, including the type of debts, the client's income and assets, the potential effect on the client's future ability and need to obtain credit, and the choice or special needs of the client. BSU volunteers then assist in carrying out the action plan in every instance.

Negotiation and Credit Counseling

If the financial interview reveals excess monthly income, the client may be a good candidate for negotiation with creditors in order to work out a payment plan, sometimes referred to as a “hardship plan.” Many creditors are willing to work out a plan if the client is able to make some minimum payment on the debt, especially if the debt is unsecured. Typical features of a hardship plan include a reduction in the interest rate, a small monthly payment, or a reduction in the amount owed. These plans are usually limited in duration, from six months to one year.

Volunteers are an invaluable resource in the negotiation and credit counseling process. A volunteer can assist the client by making calls and negotiating with the credit company on the client’s behalf. These calls can be made with the client in the office, on speaker phone, or even by conference call with the credit card company and the client at home.

Judgment Proof Clients

State and federal exemption laws protect certain types of income and property from seizure by creditors. BSU staff and volunteers should be familiar with various exemptions to which a client may be entitled. Following are several examples:

- a) Public assistance and federal benefits payments are generally exempt from the claims of creditors under state or federal law.
- b) Otherwise exempt income may lose its protected status if it is commingled in a bank account with unprotected funds. If a client has both protected and unprotected income, the client may consider opening a separate account into which *only* the protected income is deposited.
- c) Federal and state wage garnishment rules protect a portion of a client’s weekly take-home pay.
- d) Federal or state laws may protect a client’s interest in some personal property or consumer goods.

There are many other exemption rules under federal and state law, and BSU advocates must have a clear understanding of these rules in order to determine the consequences of debt for a particular client. If a client possesses *only* exempt assets and income, the client is considered “judgment proof” because even if a creditor obtains a judgment against the client, the judgment is basically worthless because all of the client’s income and assets are exempt from collection.

If the BSU determines that a client is judgment proof, then sending “judgment proof letters” to creditors is often an effective and efficient means of assisting the client. These letters advise the creditor that the client does not have any attachable income or assets and that the creditor should stop collection efforts for that reason. The letter informs creditors that a continued collection effort on the client’s account is not likely to produce any pay-off.

Judgment proof letters are prepared by a volunteer under the supervision of BSU staff. The letters are then signed and mailed by the client (Appendix D). This method conserves staff resources and involves the client in the process.

Although judgment proof letters do not carry any legal weight, many creditors will stop collection efforts after receiving the letter because the creditors understand that continued effort is a waste of resources. The BSU should inform clients that creditors may continue to send the client monthly bills or even pursue a court judgment against them (Appendix E). However, the client should also understand that because he or she is judgment proof, there are no assets or income which the creditor could take to satisfy the judgment. The client should also be aware that if his or her financial circumstances improve, the creditor may at that point collect on the outstanding judgment. Finally, the client should be advised that a court judgment can also adversely affect his or her credit rating, which may hamper his or her future access to credit.

There may be particular implications for judgment proof homeowners if the creditor obtains a judgment against the client. If the client is a homeowner, the judgment may become a lien against the client's home. This lien would need to be paid before the client could sell or refinance their home. Clients must be advised of these possibilities (Appendix F).

Cease and Desist Letters

Because judgment proof letters do not carry legal weight to stop collection efforts, creditors may still contact the client to collect on a debt. This contact can become particularly burdensome when clients receive numerous phone calls everyday from creditors. To stop the phone calls, "cease and desist" letters should be sent to each creditor and/or collection agency that contacts the client, pursuant to state or federal laws which require that the creditor/collection agency stop contacting the client upon receiving a written request to that effect.

In an effort to limit, as quickly as possible, the number of calls a client receives, LCE includes "cease and desist" language in the standard BSU judgment proof letter (Appendix D). Depending on state law, the "cease and desist" language may not be effective against creditors (as opposed to debt collectors), and the letters are probably only effective against recipients – meaning that clients usually have to request additional letters from the BSU as the debt is bounced from collector to collector. BSU staff must have a thorough understanding of the federal and state debt collection laws, including when and to whom each law applies, the details of which are outside the scope of this article.

Bankruptcy

In some circumstances, bankruptcy may, in fact, be the best option for a client. For example, if a client has non-exempt income or assets or is unable to mentally or

emotionally deal with repeated collection attempts and outstanding debt, bankruptcy deserves consideration. Bankruptcy is also an important tool to stop imminent actions, such as utility disconnection or foreclosure of a home.

Although the BSU does not typically file bankruptcy on behalf of a client, the BSU can play an important role in developing the bankruptcy case for a staff or volunteer attorney. The BSU is the first line of client contact in debt collection cases and is in a position to weigh all of the informal alternatives before resorting to bankruptcy. If BSU staff determines that bankruptcy is the best option for a client, then a BSU volunteer can work with the client to complete a bankruptcy interview and questionnaire, the results of which will be used by an attorney to complete the bankruptcy schedules.

3. Prescription Drug Assistance

LCE has recently begun a new project aimed at assisting clients to obtain free or reduced-cost prescription drugs through patient assistance programs at pharmaceutical company. As part of this new project, the BSU developed a prescription drug questionnaire as a tool to gather the necessary information to assist clients in applying for discounted or free prescription drugs (Appendix G). This questionnaire can be completed during a client interview by BSU volunteers, but it was created also with the goal of being user-friendly enough for a client to complete the questionnaire at home and then return it to the BSU for data input.

Once the BSU has compiled the necessary data, a BSU volunteer can enter the data into a computer program which returns a list of available drug programs for which the client may be eligible. It is important to note that the Medicare Prescription Drug Improvement and Modernization Act of 2003 may provide additional resources for reduced-cost prescription drugs, but an analysis of that Act and its effect on legal services providers is outside the scope of this article.

Currently, the LCE uses the website www.benefitscheckup.org, maintained by the National Council on the Aging, to analyze the data provided by the client. Once the BSU volunteer has logged onto this website, the data from the questionnaire can be entered in about 20 - 30 minutes. The website's program then generates a list of possible assistance programs to which the client may apply, including local medical assistance programs as well as patient assistance programs run by pharmaceutical and other companies.

The BSU volunteer then prints out applications for each of these programs and completes the patient portion of the application for the client. These partially completed applications are mailed to the client to take to a physician to complete the prescription portion. The client also receives a closing letter with a detailed description of each application and program specifics (Appendix H).

Sample Social Security Letter

January 1, 2004

Client Name
Address
Washington, DC 20002

Re: Appeal of Alleged Social Security Overpayment of \$251.00

Dear Client:

This letter is to advise you that Legal Counsel for the Elderly (LCE) closed your case after providing you with needed services related to the above-reference matter. On December 15, 2003, LCE assisted you to complete the following forms related to the above referenced matter:

- Request for Waiver Of Overpayment Recovery and Change in Repayment Rate (SSA-632-BK)

Thereafter, you filed this document with the Social Security Administration (SSA).

The Social Security office should send you a written decision in approximately 60 days. However, I recommend that you contact Social Security every 30-days for an update on your appeal. **Contact Social Security immediately if they begin to reduce your social security benefits** before you receive a written decision on your appeal. **Once you receive the written decision, if it is unfavorable, you have 60 days to appeal.**

If you receive an unfavorable decision, or any paperwork from the Social Security that you do not understand, and you would like Legal Counsel for the Elderly to assist you, please call 434-2120 immediately.

It was a pleasure to meet and work with you on this matter.

Sincerely,

Yvonne P. Tobias
Paralegal

Appendix C
FINANCIAL INTERVIEW SHEET

Name: _____ Date: _____

Address _____ Case #: _____

Social Security Number: _____

Client's Main Concern: _____

PROPERTIES

House: Value: \$ _____ Mortgage Balance: 1st _____ 2nd _____

Nature of Interest: Sole _____ Tenants in Common With _____

Joint Tenants With _____ T by E With _____

Arrears: 1st _____ 2nd _____

Foreclosure Date: _____

Rent: _____

Car: _____ Year: _____

Value: \$ _____ Balance due on car: _____ Arrears: _____

Any other liens on car? _____ Repossession threatened: _____

BANK ACCOUNTS:

Savings Account Bank: _____

Amount in Account: _____ Acct #: _____

Single or Joint Account? _____

Checking Account Bank: _____

Amount in Account : _____ Acct #: _____

Single or Joint Account? _____

Other Valuable Properties: _____

Life Insurance: Yes / No Value _____

Is the policy whole or term? (Circle one)

Stocks: _____ Certificate of Deposit: _____

CREDITORS

Name: _____ Amount Owed: _____

Address: _____ Sole/Joint Acct: _____

Acct #: _____ Judgment or Garnishment: _____

Name: _____ Amount Owed: _____

Address: _____ Sole/Joint Acct: _____

Acct #: _____ Judgment or Garnishment: _____

Name: _____ Amount Owed: _____

Address: _____ Sole/Joint Acct: _____

Acct #: _____ Judgment or Garnishment: _____

Name: _____ Amount Owed: _____

Address: _____ Sole/Joint Acct: _____

Acct #: _____ Judgment or Garnishment: _____

Name: _____ Amount Owed: _____

Address: _____ Sole/Joint Acct: _____

Acct #: _____ Judgment or Garnishment: _____

Name: _____ Amount Owed: _____

Address: _____ Sole/Joint Acct: _____

Acct #: _____ Judgment or Garnishment: _____

Name: _____ Amount Owed: _____

Address: _____ Sole/Joint Acct: _____

Acct #: _____ Judgment or Garnishment: _____

Name: _____ Amount Owed: _____

Address: _____ Sole/Joint Acct: _____

Acct #: _____ Judgment or Garnishment: _____

Remind client to bring in a copy of all their bills

<u>Monthly Expenses</u>	<u>Monthly Income</u>
Mortgage _____	Gross wages _____
Real Estate Taxes _____	Overtime _____
Property Insurance _____	Less deductions _____
Home Maintenance _____	Net wages _____
Rent _____	Alimony, support _____
Gas, electricity, oil _____	Private Pension _____
Water _____	Gov't Pension _____
Telephone _____	Food Stamps _____
Food _____	SSDI _____
Clothing _____	SSI _____
Laundry, dry cleaning _____	SSA _____
Medical, dental _____	Interest _____
Transportation _____	Workman's Comp. _____
Newspapers, magazines _____	Other Income _____
Charities/tithes _____	
Homeowner's insurance _____	
Life insurance _____	
Health insurance _____	
Auto insurance _____	
Other insurance _____	
Taxes _____	
Car Payment _____	
Alimony, Child Support _____	
Other Expenses _____	

Ask client if non-government income is commingled with government income. Yes / No

TOTAL MONTHLY EXPENSES: _____ TOTAL MONTHLY INCOME _____

MONTHLY OVERAGE/SHORTAGE: _____

JUDGMENT PROOF?

REFER FOR BANKRUPTCY?

COMMENTS: _____

Sample Judgment Proof Letter

John Smith

601 E Street NW
Washington, DC 20049

November 7, 2003

Capital One
123 Main Street
Washington, DC 20049

Re: Account Number XXXX XXXX XXXX XXXX

To Whom It May Concern:

I am writing to request that you stop all communications with me about this debt, pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. § 1692(c).* This letter is to advise you that due to my age, employment status, and financial circumstances, I must reluctantly suspend payments on my account. I am 85 years old, and I have very few assets. My current income is derived solely from Social Security. Unfortunately, my current financial circumstances prevent me from meeting my current financial obligations.

I consulted Legal Counsel for the Elderly about possible bankruptcy. They informed me that there should be no need for me to file bankruptcy because I am considered "judgment proof." I am enclosing for your review a current monthly budget. I have very few assets of any value, and I have not purchased anything new recently.

Please abate any collection activities that you have taken or are considering taking against me and stop all communications with me about this debt. Please send me a letter stating that the debt has been forgiven and any claims arising from a deficiency are hereby waived. I understand that any remaining privileges I may have are hereby canceled. Thank you very much for your cooperation in this matter.

Sincerely,

John Smith

* If the cease and desist letter is addressed to a creditor collecting its own debt, the reference to the federal statute should be omitted. If a state statute applies to creditors, that statute should be cited instead. Otherwise, there should be no cite and the client should be aware that the creditor is not under legal obligation to stop communications, although many times the creditor will anyway once this letter is received.

**Monthly Budget* of
Client's Name
April 2004**

Monthly Expenses		Monthly Income		
Rent	162.00		SSI	30.00
Telephone	20.00		SSA	359.00
Food	150.00			
Clothing	20.00			
Laundry, dry cleaning	10.00			
Medical, dental	25.00			
Transportation	15.00			
Total Monthly Expenses	2500		Total Monthly Income	4000

* A copy of the client's monthly budget should be included *only* if it supports the client's inability to make payments on the debt. The budget should not be included if it shows excess income. If the budget is not included, delete the reference to the budget from the sample judgment proof letter.

Sample JP Cover Letter to Client

December 17, 2002

Client
Address
Washington, DC 20032

Dear Client:

Recently you contacted the Legal Counsel for the Elderly because of your concerns regarding your debts. We reviewed your income and expenses and concluded that you were “judgment proof.”

We informed you that the Legal Counsel for the Elderly would assist you in preparing “judgment proof” letters to send to your creditors. Enclosed please find the “judgment proof” letters to be sent to your creditors. We have also enclosed additional copies of those letters for you to keep for your own records.

Please review the enclosed letters. If any corrections are needed, please call me and we will make the corrections. If there are no corrections, please sign the letters and mail them to your creditors. Please note that although you are judgment proof, your creditors may continue to write you regarding the debts. However, because you are judgment proof, you have no assets that the creditors can take to repay the debts.

If the creditors continue to call and you would like to take further steps, please give me a call at (202)434-2291.

Sincerely,

Advocate

Sample Client Letter (Homeowner)

Date

Client name and address
Washington, DC 20020

Dear Client:

Recently you contacted Legal Services because of your concerns regarding your debts. We reviewed your income and expenses and concluded that you were “judgment proof.”

We informed you that Legal Services would assist you in preparing judgment proof letters to send to your creditors. Enclosed please find those judgment proof letters to be sent to your creditors. (Also enclosed, for your records, is a copy of each letter to your creditors).

Please review the enclosed letters and budget. If any corrections are needed, please call me and we will make the corrections. If there are no corrections, please sign the letters and mail them to your creditors. Please note that although you are judgment proof, your creditors may continue to write you regarding this debt. However, because you are judgment proof, you have no assets that the creditors can take to repay the debts.

Please note that if you are a homeowner and the creditor obtains a judgment against you, the judgment may become a lien against your home. Therefore, in order to refinance or sell your home in the future, this lien would need to be paid before you can proceed with the selling or refinancing of your home.

If the creditors continue to call and you determine that you would like to take further steps, please call Legal Services at phone number.

Sincerely,

Advocate

**Sample Closing Letter
for Rx Drug Programs**

March 2, 2004

Client
Address
Washington, DC 20012

Re: Prescription Drug Programs

Dear Client,

Please find enclosed three applications for prescription drug programs. These applications were generated by a computer program based upon the information you provided to Legal Counsel for the Elderly. Using this information, the computer program came up with three drug programs for which you may be eligible. For each program, you must have your doctor complete the prescription portion of the application before you mail it. Attached to each application is a description of the drug program, but here is a summary of the three for which you may be eligible:

Bristol-Myers Squibb Patient Assistance Foundation, Inc

(Glucophage and/or Glucophage XR)

Once eligibility is determined, your doctor's office will receive a 180-month supply of the medication. After that, two 90-day refills will be sent. You must re-enroll in this program annually. You can contact Bristol-Myers Squibb directly at (800)736-0003.

Merck Patient Assistance Program

(Fosamax tablets and Zocor tablets)

Once eligibility is determined, you will receive by mail up to a 3-month supply of the medication. For information on refills, you will have to contact Merck directly at (800)727-5400.

Together Rx Card

(Glucophage and/or Glucophage XR)

This is a discount card for savings when you purchase your prescriptions at pharmacies. After you receive the card, present it along with your doctor's prescription or refill at participating pharmacies. For more information, you should call (800)865-7211.

If you have any additional questions about the particular programs, you or your physician should contact the drug companies directly. If you need assistance re-applying for these programs or any new programs in the future, please call Legal Counsel for the Elderly at (202)434-2120.

Best regards,
Advocate