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Erratum

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ERRATUM

The *Washington Law Review* inadvertently omitted a portion of the following footnote from Jennifer E. Spreng, *The Icebox Cometh: A Former Clerk's View of the Proposed Ninth Circuit Split*, 73 Wash. L. Rev. 875, 875 (1998):

* Associate, Moore, Malone & Safreed, Owensboro, Kentucky. Former clerk to the Honorable Andrew J. Kleinfeld, Ninth Circuit Court of Appeals and the Honorable F.A. Little, Jr., U.S. District Court for the Western District of Louisiana. Former professional staff member with the House Wednesday Group, U.S. Congress. J.D., 1995; Saint Louis University School of Law, *magna cum laude*. B.A. in American history, 1990, Washington and Lee University, *magna cum laude*.

I would like to thank the following people for their help in understanding Ninth Circuit split issues: Susie Headlee, J. Andrew Leman, Michael Raibman, Frank Spreng, Justin Thorp, W. Bradley Wendel, and Kim Wood. I also appreciate having had the opportunity to discuss Ninth Circuit administration issues with Judge Kleinfeld during my clerkship. Any insights into court administration I have gleaned from Congressional administration ultimately originate with Bill Connelly and Edward Kutler. Finally, I am indebted to Daniel Caslin for his unfailing support in this and so many other projects. Without all these friends, this Article could not have been written. Any errors are obviously my own.

This Article is not intended to reveal any confidential communication to which I had access while clerking for the Ninth Circuit. Such a revelation would be improper and unnecessary. I have gone to some effort to make sure I have not made that mistake. If I have unwittingly done so, I hope the parties involved and the court will accept my sincerest apologies.

