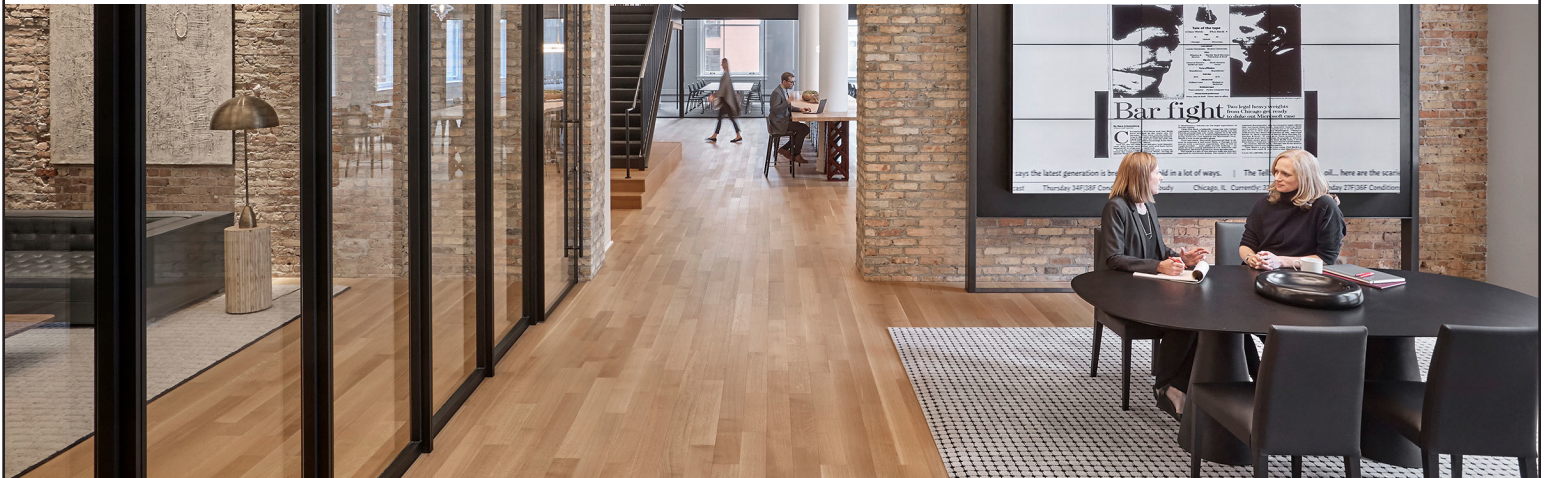


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**A COMMON LAW APPROACH TO D&O INSURANCE "IN FACT"  
EXCLUSION DISPUTES**



*U. Chi. L. Rev.*  
2012

**ATTORNEYS**

Joshua P. Ackerman