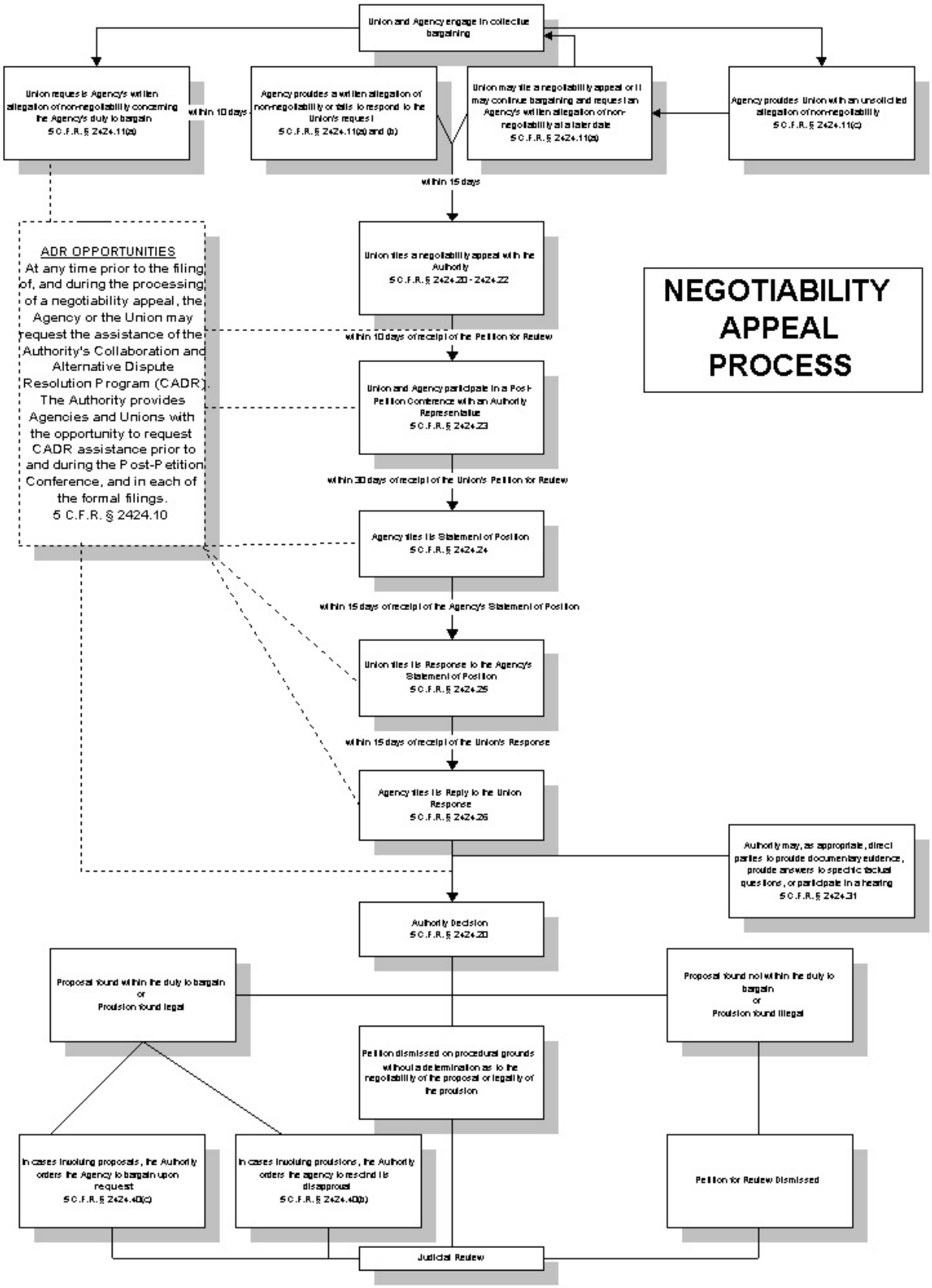NEGOTIABILITY APPEAL PROCESS