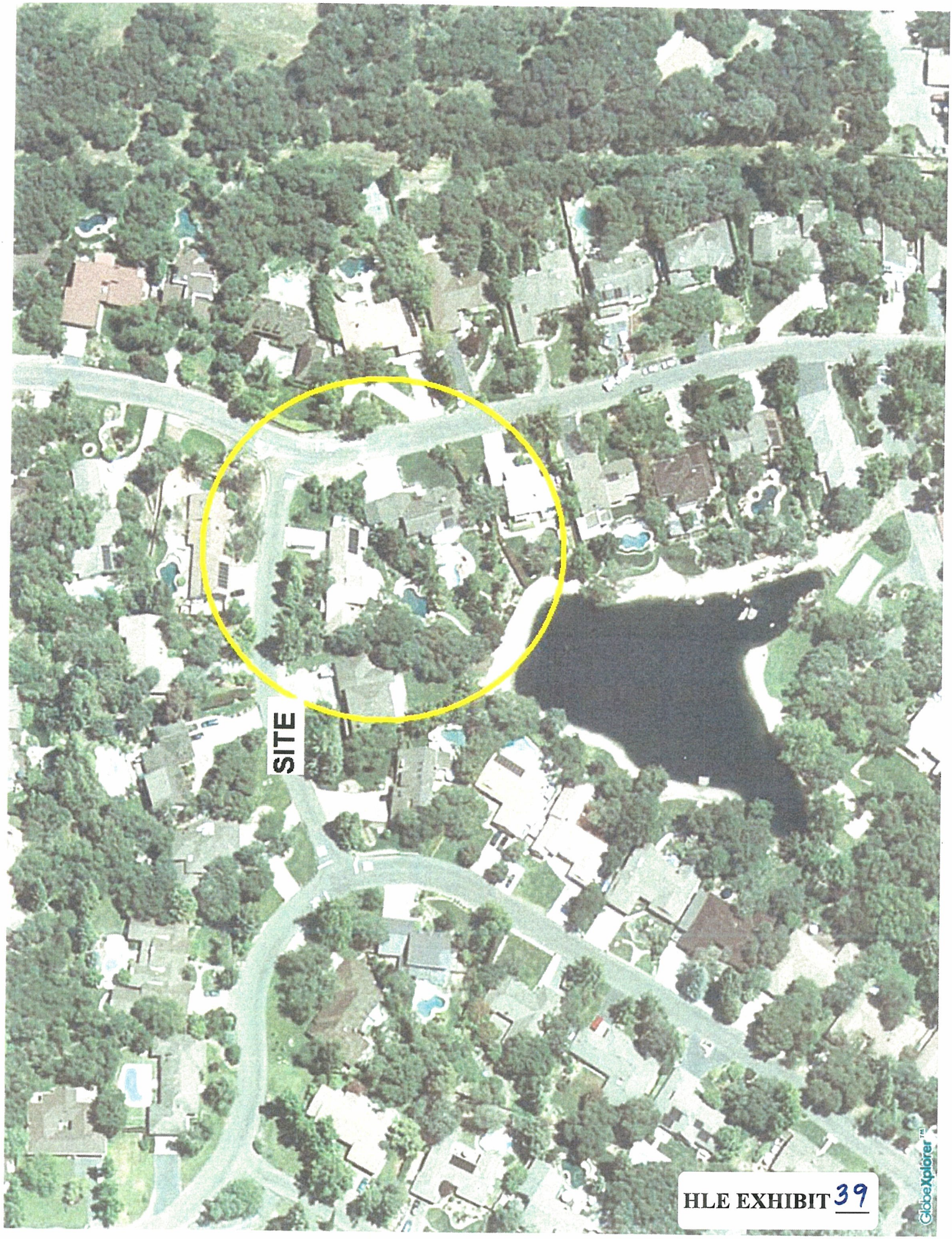
EXHIBIT 39



HLE EXHIBIT 39