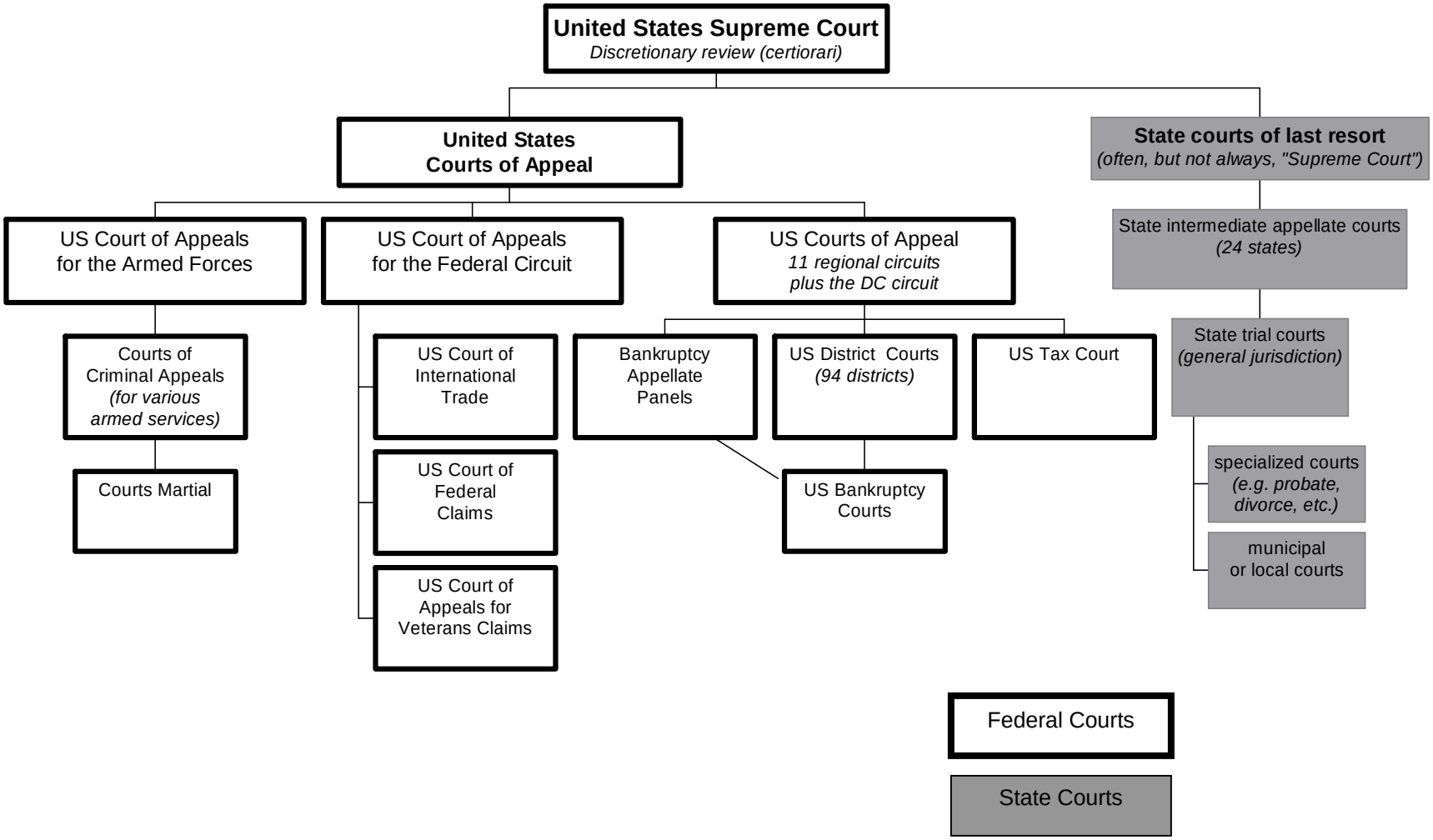Courts in the United States