

COURT OF APPEALS OF KENTUCKY
Case No. 2011-CA-000232

AMERICAN SADDLEBRED
HORSE ASSOCIATION, INC.

APPELLANT

APPELLANT'S REPLY IN FURTHER SUPPORT OF ITS
MOTION FOR STAY PENDING APPEAL

v.

EDWARD BENNETT, ET AL.

APPELLEES

Appeal from Fayette Circuit Court
No. 09-CI-05292

MAY IT PLEASE THE COURT:

Comes the Plaintiff, American Saddlebred Horse Association (hereinafter "ASHA"), by counsel, and hereby tenders ASHA's reply memorandum in further support of its Motion to stay execution of or any proceedings to enforce the trial court's final judgment of January 6, 2011, which incorporates in full the Opinion, Order and Judgment of December 2, 2010 (the "Final Judgment and Order"), pending final disposition of ASHA's appeal:

A. ASHA Is Entitled To An Automatic Stay in the Fayette Circuit Court's Final Judgment and Order Pending the Appeal Pursuant to CR 62.03

First, the Appellees argue that ASHA waived its right to an automatic stay in the enforcement of the trial court's Final Judgment and Order under CR 62.03 by not filing a motion to alter, amend or vacate the Fayette Circuit Court's interpretation of its ruling on the declaratory judgment actions as one for injunctive relief and by moving in the alternative for interlocutory relief under CR 65.08 in this Court. Such assertions lack merit and should be ignored. Clearly, the Fayette Circuit Court's interpretation of its Final Judgment and Order as one for injunctive relief is subject to de novo review by this Court. It is well within this appellate court's authority to disagree with the lower court

and deem the trial court's ruling as one automatically stayed under CR 62.03 and/or stayed under these particular circumstances. The civil rules governing appellate procedure contemplate the filing of motions with the Court of Appeals for procedural and substantive relief in the course of an appeal timely made and pending before the appellate court.¹ ASHA filed its motion for stay under these rules and has not waived its right to a stay pending an appeal of a judgment other than an injunction judgment as provided under CR 62.03 and/or under these particular circumstances.

The relief sought in the trial court by both ASHA and the Appellees was one for declaratory relief only. It was an issue of first impression in the Commonwealth of Kentucky – what is the scope of a non-profit association member's right of inspection of documents under KRS §273.233? The parties did not plead for injunctive relief, and the Court did not conduct any sort of injunctive hearing or proceeding. The trial court did not hear testimony regarding any alleged corporate mismanagement of ASHA, nor did it examine the content of any documents withheld under the statute.² The trial court simply considered legal memoranda and heard oral argument from the parties on their respective positions regarding the language, intent and purpose of KRS §273.233 and rendered an interpretation of the statute. To execute on such a judgment while ASHA's appeal is pending would moot the appeal and deprive ASHA of its constitutional right to one appeal.³ For these reasons, and for reasons stated in ASHA's motion for stay pending

¹ See CR 76.34.

² Indeed, while Appellees continue to accuse ASHA of corporate mismanagement and/or fraud, they have yet to make any showing or to produce any evidence of such misconduct by ASHA's directors, officers or employees despite having the opportunity to inspect the books and records of account kept by ASHA in accordance with KRS §273.233.

³ See Kentucky Constitution §115 ("In all cases, civil and criminal, there shall be allowed as a matter of right at least one appeal to another court...").

appeal, ASHA maintains that the Final Judgment and Order should be deemed automatically stayed.

B. In the Alternative, ASHA Is Entitled To A Stay Under CR 65.08

With regard to ASHA's alternative request for interlocutory relief under CR 65.08, Appellees baldly assert that they are entitled to immediate production of all documents in ASHA's possession because ASHA refused to produce most of the financial records requested by the members prior to this lawsuit. This is a blatant misrepresentation. The Appellees took the deposition testimony of Carl Holden, the Board member serving as the Finance Committee Chairman at the time the financial record requests were made. Appellees now fail to mention in their Response that Mr. Holden confirmed that all information required of a nonprofit association had been provided, and that it specifically included all financial records:

Q Did you agree with the ASHA's decision to withhold financial documents from its members?

MR. STOPHER: Objection.

A It's my understanding that the financial records and books of accounts were not withheld; that those were provided.

...

Q The ASHA decided to file a lawsuit without determining if the financial records were indeed disclosed?

A To my knowledge, those financial records were presented....

...

Q Who made the decision to produce certain documents and withhold certain other documents?

MR. STOPHER: Objection.

A I'm not aware of any documents that were rejected or not submitted.⁴

Furthermore, Mr. Holden confirmed that despite repeated requests to identify what documents they felt were not being disclosed, the Appellees never provided anything other than vague assertions:

A To my knowledge, those financial records were presented. Let me make one comment. I was aware of numerous occasions the members were asked what documents have you not seen and I never recall seeing the response that these documents were not available.

Q Do you recall seeing a list of documents that were requested by the concerned members?

A Numerous times.

Q And do you recall seeing follow-ups from those members stating that those particular documents, certain particular documents had not been provided?

A My recollection that it was all in a kind of generic response that all documents have not been produced. I've never seen a report that said the financial reports for November of 2004 were not included or the balance sheet for January 2006 was not included or that this specific line item was not included. I never saw any kind of detail like that. It was all a very generic response that all the documents were not produced. And when you're dealing with something of that mass, that's hard to get your arms around.⁵

Thus, contrary to the glaring misrepresentations made by Appellees, the undisputed record shows that the only documents that were redacted or withheld by ASHA are those containing confidential information (such as individual social security numbers and credit card account numbers), communications made with an expectation of

⁴ See Exhibit ("Ex.") 1, Deposition of Carl Holden, March 11, 2010, pp. 41-43.

⁵ *Id.* at pp. 42-43.

privacy, and private personnel and individually identifying payroll files and information. The issue now before this Court is whether the Appellees have the right to inspect and copy any and all other documents in the possession of ASHA, without limitation. Without a stay entered by this Court, ASHA will be denied its right to an appeal on this one issue.

With regard to ASHA's showing of irreparable harm, Appellees incongruously suggest that ASHA's position, even upon success on appeal, would not be impaired by premature disclosure of information to the Appellees while failing to address the fact that any document ASHA exchanges with Appellees' counsel in this litigation is immediately posted on internet blog sites for the entire world to see.⁶ If enforcement proceedings are not stayed in the Fayette Circuit Court pending the appeal, the Appellees or their representatives will most certainly do the same with each and every document produced pursuant to the Final Judgment and Order. A stay in the enforcement of the Final Judgment and Order is therefore imperative to preserve any prospect for relief from disclosure of such confidential information pending ASHA's appeal.

While the Appellees would like this Court to sacrifice the present rights of ASHA, its directors, officers, employees and members so that they may immediately apply the trial court's interpretation of a statute, it is a fundamental principal of our justice system, indeed a constitutional right in the Commonwealth of Kentucky, to afford those affected

⁶ See examples of web postings made by Appellees on the website, www.saddlebredcentral.com, attached hereto as Ex. 2.

by an adverse ruling at least one appeal to determine whether the lower court erred in its decision.⁷ That is all ASHA is asking of this Court here.

Respectfully submitted by:

BOEHL STOPHER & GRAVES, LLP



Edward H. Stopher

Jefferson K. Streepey

Earl L. Martin, III

Jeff W. Adamson

AEGON Center, Suite 2300

400 West Market Street

Louisville, KY 40202

Phone: (502) 589-5980

Fax: (502) 561-9400

and

James B. Cooper

Boehl Stopher & Graves LLP

444 West Second Street

Lexington, Kentucky 40507-1009

Phone: (859) 252-6721

Fax: (859) 253-1445

COUNSEL FOR APPELLANT

⁷ See Appellees' Response to Appellant's Motion for Stay Pending Appeal, p. 5 ("...unless ASHA is successful on the substantive issue on appeal, ASHA members will be entitled to inspect ASHA's books and records now and in the future. Thus, ASHA must continue its appeal, regardless of whether it obtains a stay...").

CERTIFICATE OF SERVICE

It is hereby certified this 1st day April, 2011 that a copy of the foregoing was served via First Class Mail, postage prepaid, to the following:

Hon. Lewis G. Paisley
Stoll Keenon Ogden PLLC
300 W. Vine Street, Suite 2100
Lexington, KY 40507

-and-

Culver V. Halliday
Stephen A. Houston
Stoll Keenon Ogden PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202

Counsel for Appellees

Clerk, Fayette Circuit Court
120 N. Limestone Street
Lexington, KY 40507


COUNSEL FOR APPELLANT

325133.1

COMMONWEALTH OF KENTUCKY
FAYETTE CIRCUIT COURT
22nd JUDICIAL CIRCUIT
DIVISION 3
CIVIL ACTION NO. 09-CI-05292

AMERICAN SADDLEBRED)	DEPOSITION TAKEN ON
HORSE ASSOCIATION, INC.,)	BEHALF OF DEFENDANTS
)	BY: NOTICE
PLAINTIFF)	
vs.)	
)	
EDWARD R. BENNETT,)	
CARL T. FISCHER, JR.,)	
KRIS KNIGHT, TOM FERREBEE,)	
SIMON FREDERICKS, M.D.,)	
and LYNN W. VIA,)	WITNESS:
)	
DEFENDANTS)	CARL HOLDEN

* * * *

* * * *

The deposition of CARL HOLDEN was taken before Ann E. Chastang, Court Reporter and Notary Public in and for the State of Kentucky at Large, at the law offices of STOLL, KEENON, OGDEN, PLLC, 300 West Vine Street, Suite 2100, Lexington, Kentucky, on Thursday, March 11, 2010, commencing at the approximate hour of 9:00 a.m. Said deposition was taken pursuant to Notice, heretofore filed, to be read and used on behalf of the Defendants at the trial in the above-captioned action and all other purposes as permitted by the Kentucky Rules of Civil Procedure.

* * * *

* * * *



1 APPEARANCES:

2

3

HON. STEPHEN A. HOUSTON
STOLL, KEENON, OGDEN, PLLC

4

300 West Vine Street
Suite 2100

5

Lexington, Kentucky 40507

6

COUNSEL FOR THE DEFENDANTS

7

8

9

10

HON. EDWARD R. STOPHER

11

BOEHL, STOPHER, & GRAVES, LLP

12

400 West Market Street

13

Suite 2300

14

Louisville, Kentucky 40202

15

16

COUNSEL FOR THE PLAINTIFF

17

18

19

20

21

22

23

24

25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20

I N D E X

WITNESS: CARL HOLDEN

CROSS-EXAMINATION

By Mr. Houston..... 4 - 51

REPORTER'S CERTIFICATE 52

1 Q. Did you agree with the ASHA's decision to
2 withhold financial documents from its
3 members?

4 MR. STOPHER: Objection.

5 A. It's my understanding that the financial
6 records and books of accounts were not
7 withheld; that those were provided.

8 Q. Do you know if the monthly reports that the
9 finance committee reviews were provided to
10 the members?

11 A. If they were provided with all the minutes,
12 then they should have been provided. I don't
13 know specifics.

14 Q. But you believe those should have been
15 provided?

16 A. The minutes of the meetings, yes.

17 Q. What about the monthly report that was
18 provided to the finance committee members?

19 A. It's my understanding that those monthly
20 reports were provided to the members.

21 Q. Who told you that?

22 A. The executive secretary as well as -- the
23 executive secretary reported that all
24 financial records were presented and were
25 prepared and presented for review. And I

1 personally witnessed eight boxes of data that
2 were available for review.

3 Q. Did you look through those eight boxes?

4 A. I did not.

5 Q. Did anybody look through those boxes to
6 determine if indeed all of the financial
7 records were provided to the members?

8 A. I don't know.

9 Q. The ASHA decided to file a lawsuit without
10 determining if the financial records were
11 indeed disclosed?

12 A. To my knowledge, those financial records were
13 presented. Let me make one comment. I was
14 aware of numerous occasions the members were
15 asked what documents have you not seen and I
16 never recall seeing the response that these
17 documents were not available.

18 Q. Do you recall seeing a list of documents that
19 were requested by the concerned members?

20 A. Numerous times.

21 Q. And do you recall seeing follow-ups from
22 those members stating that those particular
23 documents, certain particular documents had
24 not been provided?

25 A. My recollection that it was all in a kind of

1 generic response that all documents have not
2 been produced. I've never seen a report that
3 said the financial reports for November of
4 2004 were not included or the balance sheet
5 for January 2006 was not included or that
6 this specific line item was not included. I
7 never saw any kind of detail like that. It
8 was all a very generic response that all the
9 documents were not produced. And when you're
10 dealing with something of that mass, that's
11 hard to get your arms around.

12 Q. Do you think that it made sense for the
13 concerned members to accept the ASHA's offer
14 to come review whatever they wanted and
15 discuss it with the board?

16 A. Yes.

17 Q. Who made the decision to produce certain
18 documents and withhold certain other
19 documents?

20 MR. STOPHER: Objection.

21 A. I'm not aware of any documents that were
22 rejected or not submitted.

23 Q. Are you aware that this litigation is to
24 address whether or not members are entitled
25 to documents that were not produced?

1 STATE OF KENTUCKY)
COUNTY OF FAYETTE)

2

I, ANN E. CHASTANG, the undersigned Notary
3 Public in and for the State of Kentucky at Large,
certify that the facts stated in the caption hereto are
4 true; that at the time and place stated in said caption
the witness named in the caption hereto personally
5 appeared before me, and after being by me duly sworn,
6 was examined by counsel for the parties; that said
7 testimony was taken down in stenotype by me and later
8 reduced to computer transcription by me, and the
9 foregoing is a true record of the testimony given by
10 said witness.

11 My commission expires: May 12, 2011.

12 IN TESTIMONY WHEREOF, I have hereunto set my
13 hand and seal of office on this the 16th day of
14 March, 2010.

15
16
17
18
19
20
21
22
23
24
25

ANN E. CHASTANG,
NOTARY PUBLIC, STATE-AT-LARGE
K E N T U C K Y

- [Home](#)

ASHA loses the lawsuit it filed against some of its members.


December 10th, 2010

The ASHA sued to prevent its members from inspecting ASHA's corporate records, but the Court rejected the ASHA's arguments and declared that Kentucky law entitles the members to inspect and copy the corporate records.

The purpose of this website is to inform the general membership of the lawsuit the American Saddlebred Horse Association brought upon the "Concerned Members." Below are all legal documents and briefs connected to this lawsuit. The information contained on this website will assist you in forming your own opinion of these proceedings. This site will be kept updated with any new documents that may be submitted to the court regarding this matter.

Attached are copies of:

(1) the Court's Opinion, Order and Judgment; dated December 2nd, 2010;

 [Court Decision](#) (97.0 KiB, 243 hits)


(2) the Complaint filed by the ASHA initiating this lawsuit against certain senior members; dated October 6th, 2009;

 [ASHA Complaint](#) (1.1 MiB, 208 hits)

(3) the Answer and Counterclaim filed on the members' behalf; dated August 25th, 2009;

 [ASHA Members Answers](#) (1.4 MiB, 178 hits)


(4) ASHA's Motion for Summary Judgment; dated April 15, 2010;

 [ASHAs Motion](#) (2.0 MiB, 101 hits)

(5) the Members' Motion for Summary Judgment; dated May 14th, 2010;

 [Members Motions](#) (1.4 MiB, 121 hits)

(6) ASHA's Reply Brief; dated June 1st, 2010;

 [ASHAs Reply](#) (137.5 KiB, 118 hits)

(7) the Members' Reply Brief; dated June 15th, 2010;



 [Members Reply](#) (64.5 KiB, 154 hits)

Posted in [Docs](#) | [No Comments »](#)

March 25, 2011 – Members' Response to ASHA's Motion

March 25th, 2011

Attached is a copy of the Members' Response to ASHA's Motion for Stay Pending Appeal. It was filed today with the Court of Appeals.

 [Appellees' Response to Appellant's Motion for Stay Pending Appeal](#) (563.3 KiB, 93 hits)

Posted in [Docs](#) | [Comments Off](#)

March 24, 2011 – Order issued by Court of Appeals

March 24th, 2011

The Court of Appeals issued an order granting ASHA a temporary stay until a three-judge panel has the opportunity to rule on ASHA's request for a stay pending the entire appeal. This was what we expected to happen because it is routine for the Court of Appeals to grant a temporary stay until it is able to rule on the motion.

We anticipate that the three-judge panel will make a decision during their monthly meeting on April 14, 2011. The written decision is usually issued within 2 weeks following the monthly meeting.

 [Order Granting Stay](#) (58.3 KiB, 25 hits)

Posted in [Docs](#) | [Comments Off](#)

March 18, 2011 ASHA Seeks Emergency Relief from Court

March 18th, 2011

ASHA has asked the Court of Appeals for emergency protection from enforcement of the Fayette Circuit Court's ruling that the ASHA must disclose certain financial and other corporate records.

 [ASHA EMERGENCY MOTION FOR STAY](#) (148.3 KiB, 67 hits)

 [ASHA MOTION FOR STAY PENDING APPEAL](#) (432.4 KiB, 43 hits)

Posted in [Docs](#) | [Comments Off](#)

March 14, 2011 – PreHearing Conference Order

March 14th, 2011

Attached is a copy of the Order scheduling the prehearing conference call with the Court of Appeals.

[!\[\]\(3ed193150ebea7ccd4ff6ad1634a6c3b_img.jpg\) **PreHearing Conference Order** \(9.4 KiB, 79 hits\)](#)

Posted in [Docs](#) | [Comments Off](#)

March 1, 2011 Court's order denying the ASHA's request

March 1st, 2011

After the Court ruled that the law requires the ASHA to allow its members to inspect the corporate records, the ASHA asked the Court to delay enforcement of that order until an appeal is finished. On February 18, 2011, the Court heard arguments by both sides and then denied ASHA's request. ASHA was responsible for preparing a written order setting forth the Court's ruling. However, ASHA submitted an Order to the Court that was not consistent with the Court's ruling. In response, the Concerned Members submitted an Order to the Court that was consistent with the Court's ruling. The Court rejected ASHA's proposed Order and entered the accurate Order submitted by the Concerned Members.

[!\[\]\(c7342d231167e17d84490afde2880e30_img.jpg\) **Order Denying ASHA's Motion for Stay** \(214.8 KiB, 83 hits\)](#)

Posted in [Docs](#) | [Comments Off](#)

Feb 18, 2011 – Court denied the ASHA's request

February 18th, 2011

The Court denied the ASHA's request for a stay of the judgment pending the entire appeal. The Court granted a temporary stay of the judgment (45 days) to allow the ASHA to decide if it wants to ask the court of appeals for a longer stay.

Posted in [Docs](#) | [Comments Off](#)

Feb 17, 2011 – Response to ASHA's Motion for a Stay

February 17th, 2011

Attached is a copy of the Member's Response to ASHA's Motion for a Stay. The hearing is scheduled to take place Feb. 18th, 2011 at 8:30AM in Fayette Circuit Court.

[!\[\]\(babf7db3ccb366b82198c3e76e2a29bd_img.jpg\) **Members' Response to ASHA Motion for Stay** \(88.7 KiB, 77 hits\)](#)

Posted in [Docs](#) | [Comments Off](#)

Feb 12, 2011 – CM's Response

February 12th, 2011

CM's response to ASHA.

 [CM's Response to ASHA](#) (11.6 KiB, 125 hits)

Posted in [Docs](#) | Comments Off

[Feb 8, 2011 – ASHA's Motion for Stay Pending Appeal](#)

February 8th, 2011

The ASHA filed a motion asking the Fayette Circuit Court to stay any enforcement of its order pending the appeal. The motion is set to be heard this Friday. A copy of the motion is attached.

 [ASHAs Motion for Stay Pending Appeal.pdf](#) (793.8 KiB, 95 hits)

Posted in [Docs](#) | Comments Off

[Feb 7, 2011 Statements and Responses](#)

February 7th, 2011

ASHA's statements and Concerned Members' Responses

 [Message from ASHA President](#) (117.7 KiB, 92 hits)

 [Response to 12-22-10 Message from ASHA President](#) (14.4 KiB, 76 hits)

 [2-3-11 ASHA Statement](#) (58.6 KiB, 72 hits)

 [Response to 2-3-2011 ASHA Press Release](#) (13.5 KiB, 74 hits)

Posted in [Docs](#) | Comments Off

[February 3, 2011 ASHA Board Continues to Prevent Members](#)

February 3rd, 2011

ASHA Board continues its efforts to prevent members from reviewing corporate records; the board decided to appeal the decision of the Fayette Circuit Court.

 [Notice Of Appeal](#) (21.8 KiB, 96 hits)

Posted in [Docs](#) | Comments Off

[January 6, 2011 Final Judgment and Order in Favor of Concerned Members](#)

January 7th, 2011

The Final Judgment and Order incorporates the December 2, 2010 order, by reference, and confirms that the Members are entitled to inspect and copy all of the ASHA's corporate records. Although the ASHA had requested the Court to provide it with a 30 day grace period to comply with the Court's ruling, the Final Judgment and Order does not provide the ASHA with a 30 day grace period.

 **Final Order and Judgement** (217.1 KiB, 131 hits)

Posted in [Docs](#) | [Comments Off](#)

January 6th, 2011 Message from Concerned ASHA Members

January 5th, 2011

Message From Concerned ASHA Members

On December 22, 2010, the President of the ASHA, Judith Werner, distributed her message about the lawsuit the ASHA filed against a few of its Members. Her message is not accurate, and it conflicts with the law governing non-profit organizations in Kentucky. In short, the ASHA refuses to allow its Members to inspect corporate records relating to expenses ranging from a few hundred dollars to several hundred thousand dollars. On December 2, 2010, a Court ruled that the ASHA's decision to withhold those corporate records from its Members violates the law. Nonetheless, the ASHA has still not produced those records and is considering spending more money and time by asking yet another Court to interpret the same, clearly worded law.

Ms. Werner contends that the Members have refused to articulate their concerns and reasons for asking to see the corporate records. That is simply not true, and it is troubling that Ms. Werner is misleading ASHA members on this issue. The Members described their concerns in detail in their initial letter requesting to inspect specific corporate records relating to large corporate expenses. That letter, dated April 20, 2009, is available for review on www.saddlebredcentral.com (along with other documents containing the arguments made by both sides and the Court's ruling in favor of the Members). Furthermore, in February of 2009, an auditor identified "significant deficiencies" in the ASHA's financial policies. Since the ASHA has an annual budget of approximately \$2 Million, it should be no surprise that its Members would expect the organization to have appropriate financial oversight.

Shamefully, Ms. Werner argues that the ASHA has limited resources and the requests made by the Members have strained the ASHA. To be clear, it is the ASHA who could have simply opened its doors and allowed the Members to review the corporate records they requested (and have a right to inspect under the law). That would have been the most efficient and appropriate response. Instead, the ASHA opted to file a lawsuit requiring the ASHA and the Members to expend time and resources litigating the interpretation of a clearly worded law.

Please go to www.saddlebredcentral.com to review court records and related documents in detail. As you will see, the Court agreed that the law is clear that non-profit organizations must operate with transparency by allowing members to inspect the corporate records to ensure that all of its revenues and assets are used appropriately. If you agree that the ASHA should stop hiding corporate records from its members, please

contact the ASHA Board and let them know that you do not approve of any further attempts to avoid complying with the law.

Concerned Members
Edward "Hoppy" Bennett
Tom Ferrebee
Carl Fischer, Jr.
Dr. Simon Fredricks
Kris Knight
Lynn Via

 [Message From ASHA Members](#) (14.4 KiB, 78 hits)

Posted in [Docs](#) | Comments Off

[December 27, 2010 Members' Reply in Opposition](#)

December 28th, 2010

Attached is a copy of the Members' Reply in Opposition to the Proposed Final Judgment Tendered by the ASHA. It was filed with the Court and served on the ASHA on 27th Dec. 2010.


 [Members Reply in Opposition](#) (29.2 KiB, 124 hits)

Posted in [Docs](#) | Comments Off

[December 27, 2010 ASHA Response](#)

December 28th, 2010

ASHA Response filed with the Fayette Circuit Court on 27th Dec. 2011.

 [ASHA Response](#) (180.7 KiB, 129 hits)

Posted in [Docs](#) | Comments Off

[« Older Entries](#)

- Recent Posts

- [March 25, 2011 – Members' Response to ASHA's Motion](#)
- [March 24, 2011 – Order issued by Court of Appeals](#)
- [March 18, 2011 ASHA Seeks Emergency Relief from Court](#)
- [March 14, 2011 – PreHearing Conference Order](#)
- [March 1, 2011 Court's order denying the ASHA's request](#)

- Categories

- [Docs](#)

- [Home](#)

Copyright ©2009 Saddlebred Central. Powered by [WordPress](#). [Entries \(RSS\)](#) and [Comments \(RSS\)](#).