

# NORTH DAKOTA LAW REVIEW

Volume 98

2023

Number 2

## 2022-2023 BOARD OF EDITORS

ELIZABETH ROTHERHAM  
*Editor in Chief*

AUSTIN EGGL  
*Managing Editor*

CASEY ORVEDAL  
*Technical Editor*

HALEY FINCH  
*Outside Articles Editor*  
*Co-Symposium Editor*

JACKSON ELMQUIST  
*Student Articles Editor*

CAITLIN BAKER  
*Research Editor*  
*Co-Symposium Editor*

### STAFF

SARAH BELLISTON  
NICHOLAS JOHNSON  
SAPIR SELA  
ANNEMARIE STUDER

ZACHARY HEIER  
COLIN KEARNEY  
ARYAN SIADAT

LAURA HELGESON  
DANIELLE MIDDLETON  
ERICA SOLBERG  
GABRIELLE WOLF

FACULTY ADVISOR  
MICHAEL S. MCGINNISS

NORTH DAKOTA LAW REVIEW  
is the journal of the  
State Bar Association of North Dakota

JENNIFER E. ALBAUGH, *President*  
TAYLOR D. OLSON, *President-Elect*  
ROBERT G. MANLY, *Secretary-Treasurer*  
TONY J. WEILER, *Executive Director*

1661 Capitol Way, Suite 104LL  
Bismarck, North Dakota 58501

The views herein expressed are those of the individual authors and are not necessarily those of the State Bar Association or the NORTH DAKOTA LAW REVIEW.

---

The NORTH DAKOTA LAW REVIEW (ISSN 0029-2745) is a triannual publication by the University of North Dakota School of Law, 215 Centennial Drive, Stop 9003, Grand Forks, North Dakota 58202-9003. Subscription charges are \$30.00 per volume or \$10 per issue (plus postage). Postage Paid at Grand Forks, North Dakota, and additional mailing offices. POSTMASTER: Send address changes to NORTH DAKOTA LAW REVIEW, University of North Dakota School of Law, 215 Centennial Drive, Stop 9003, Grand Forks, ND 58202-9003.

Each issue is provided to subscribers in electronic form unless the subscriber requests to receive the hard copy by contacting the LAW REVIEW. With the release of a new issue, each subscriber will receive an e-mail notification that the issue is available electronically at [www.law.und.edu/LawReview/](http://www.law.und.edu/LawReview/). The LAW REVIEW is not responsible for missed issues due to failure to notify the LAW REVIEW of a change of address. Members of the North Dakota Bar must notify the LAW REVIEW of any change in address.

Members of the North Dakota Bar Association receive the LAW REVIEW for a fee of \$10.00 per year, automatically extracted from their yearly dues. Subscriptions will be renewed automatically unless notice of cancellation is received.

Questions concerning business and requests for reprints should be addressed to NORTH DAKOTA LAW REVIEW, University of North Dakota School of Law, 215 Centennial Drive, Stop 9003, Grand Forks, North Dakota 58202-9003. Telephone (701) 777-2941. Fax (701) 777-2217. Visit the NORTH DAKOTA LAW REVIEW'S web page at <http://www.law.und.edu/law-review/>.

The NORTH DAKOTA LAW REVIEW is a member of the National Conference of Law Reviews.  
Copyright © 2023, by the NORTH DAKOTA LAW REVIEW.