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nature, are mutually exclusive. A "special circumstance" is a "circumstance in which the Supreme Court held that there was sufficient likelihood that the plaintiff would again face the issue raised, yet able to obtain full review by waiting for the case to become moot." *Walker v. City of Mesquite*, 129 F.3d 831, 832-33 (5th Cir. 1997). "In contrast, a case will not be moot if the possibility exists that the complaining party may be subject to the same action again." *Id.* at 832 (citing *Murphy v. Hunt*, 455 U.S. 478, 482 (1982)) (internal quotations omitted).¹⁴ The first two exceptions to the mootness doctrine in *American Ins. Co. v. Geehan* did not involve a dispute between a debtor and a third party over a prepetition debt. The insurance company in

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in Maryland. According to the statement, GERD is a chronic disease that affects approximately 30% of adult Americans. The statement clarifies that GERD represents a spectrum of diseases, including mild symptoms (heartburn) and relatively asymptomatic disease. Several risk factors have been linked to GERD. It is associated with pregnancy, pregnancy-related weight gain, and delivery in cesarean section. Also, GERD is associated with obesity, metabolic syndrome, hiatal hernia and diaphragmatic hernia. GERD is associated with reflux esophagitis, gastroesophageal reflux and other complications. The statement offers an updated review of current GERD diagnostic and management strategies. Severe GERD can affect the esophagus, stomach, or the lungs. Diagnosis of GERD includes endoscopy. The aim of therapy is to reduce symptoms and prevent complications.

Treatment options include pharmacotherapy and surgery. The statements and opinions expressed are solely the responsibility of the author and do not

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