F. (No. 15)

v.

EPO

136th Session **Judgment No. 4711**

THE ADMINISTRATIVE TRIBUNAL,

Considering the fifteenth complaint filed by Mr T. F. against the European Patent Organisation (EPO) on 30 April 2021, the EPO's reply of 25 April 2022, the complainant's rejoinder of 31 October 2022 and the EPO's surrejoinder of 6 February 2023;

Considering Articles II, paragraph 5, and VII of the Statute of the Tribunal;

Having examined the written submissions and decided not to hold oral proceedings, for which neither party has applied;

Considering that the facts of the case may be summed up as follows:

The complainant challenges the abolition of automatic step advancement pursuant to the introduction of a new career system.

On 11 December 2014, the Administrative Council of the European Patent Office, the EPO's secretariat, adopted decision CA/D 10/14 introducing a new career system, which entered into force on 1 January 2015. The new career system substantially modified the way job categories were divided. It introduced a "single spine" structure consisting of 17 grades instead of the former three categories of jobs. Two career paths were established: a managerial path and a technical path. Employees continued to enjoy horizontal step advancement and vertical promotion to higher grades, but the underlying principle of the new career system was that progression was based on sustained performance and

demonstrated competencies rather than time spent within a step or grade. The decision provided that transposition from the current to the new career system should be made taking into account the employee's situation on 31 December 2014. It also provided that no reduction in basic salary should result from the transposition, and that the salary adjustment method in force since 1 July 2014 should apply to the new salary scales and the salary resulting from the transposition.

The complainant held grade A3, step 4, on 31 December 2014. On 30 April 2015, he was notified that, pursuant to decision CA/D 10/14, he was transposed into job group 4 and assigned grade G10, step 3, in the new salary scales with effect from 1 July 2015.

On 25 May 2015, he received his May payslip, which showed in his view that he was denied the automatic step advancement that he should have received if decision CA/D 10/14 had not been implemented. In July 2015, he filed a request for review challenging that payslip on the ground, inter alia, that the procedure leading to the adoption of decision CA/D 10/14 was flawed and that decision CA/D 10/14 was substantively flawed with respect to step advancement. He requested to be granted the step advancement that was denied to him in the May payslip and asked that his total basic salary under the new career system take into account the said step advancement.

In September 2015, his request for review was rejected as unfounded. On 26 November 2015, he filed an appeal with the Appeals Committee against that rejection. He requested the setting aside of the contested decision, "a declaration of illegality of CA/D 10/14", the granting of the step he was entitled to under the previous salary system, and recalculation of his basic salary on that basis. He also sought financial compensation and moral damages.

On 18 November 2020, the enlarged chamber of the Appeals Committee issued its opinion concerning several appeals filed against the new career system, in particular regarding the abolition of the automatic step advancement and the grade transposition. It organised some joint oral hearings, with one concerning the appeal filed by the complainant. The members of the Appeals Committee unanimously stated that the request to quash decision CA/D 10/14 may be examined

only in relation to the particular provisions of the regulations which were applied to the complainant and to the adverse effect the regulations may have had on him. The legal situation surrounding the implementation of the new career system, in particular the difference between the entry into force of the reform in January 2015 and the transposition of staff as of July 2015, was unclear; therefore, it considered that appellants were allowed to challenge their payslip, like the complainant did in the present case, or the transposition letter, which he has also contested and is at stake in his 16th complaint (see Judgment 4712). The majority recommended rejecting the complainant's appeal as unfounded. In its view, decision CA/D 10/14 was lawfully adopted and the individual contested decision was lawful. It considered that there was no acquired right in relation to automatic step advancement as it could not reasonably be regarded as relating to a fundamental term of employment or a condition in consideration of which the complainant accepted the appointment or was induced to stay on. It also held that the reasons invoked to undertake the reform, that is to say performance-management and financial prudence, were objectively justifiable. The impact of the reform on staff members was proportionate to the objectives sought. The minority disagreed and recommended upholding the complainant's appeal as founded and granting him the relief claimed, in particular moral damages for the prejudice resulting from the illegality of the contested decision. According to the minority, the new career system was flawed due to the presence of Vice-Presidents and members of the Management Committee (MAC) on the General Consultative Committee (GCC), the consultative body to which the proposed reform was submitted. It also found that the consultation process of the GCC was not conducted in good faith. The minority considered that the complete abolition of the seniority-based step advancement constituted a breach of acquired rights, and that the EPO did not fulfill its duty of care towards its employees as no proper transitional measures were established to protect them against sudden and significant adverse changes. It further found that the EPO breached its duty to inform staff members regarding the change of rules for step advancement. The Appeals Committee unanimously recommended that the complainant be awarded 600 euros in moral damages for the unreasonable length of the appeal proceedings.

By a letter of 4 February 2021, the complainant was informed of the Office's decision to follow the recommendations of the majority of the Appeals Committee for the reasons stated in the opinion. Consequently, his appeal was rejected as unfounded. He was nevertheless awarded 600 euros in moral damages for the length of the appeal proceedings and a further 100 euros in moral damages for the time elapsed since the deliberation of the Appeals Committee. That is the impugned decision.

The complainant asks the Tribunal to quash the impugned decision of 4 February 2021, the "individual decision" and the general decision, in particular as it introduced the new Article 48 of the Service Regulations for permanent employees of the Office. He asks the Tribunal to order that his salary be recalculated in light of the progression he should have had under the old system on the day the Tribunal delivers its judgment and taking into account the adjustment of the salary scales since 1 January 2015 plus interest. He also asks the Tribunal to order that he be reimbursed the underpayment he has faced since 2015 according to the calculation of the progression made as described above, plus interest per year of delay. He further seeks an award of financial and material damages for the loss of opportunity in his career and salary progression as well as the breach of his acquired right and legitimate expectations. He claims an award of moral damages for breach of duty of care, and for undue delay in the internal appeal proceedings, as well as costs.

The EPO asks the Tribunal to reject the complaint as irreceivable to the extent that the complainant seeks the setting aside of aspects of decision CA/D 10/14 that were not applied to him. It considers that the claim for material damages is irreceivable for failure to exhaust internal means of redress as he did not make such claim internally, and the claim for financial damages should be rejected as it is too vague. The EPO stresses that he was paid 600 euros for the length of the appeal proceedings as unanimously recommended by the Appeals Committee, plus an extra 100 euros. The EPO adds that, insofar as he seeks compensation for the same claims in separate proceedings, the reliefs claimed cannot be granted. Lastly, it asks the Tribunal to reject the complaint as otherwise unfounded. Regarding the claim for costs, the

EPO asks the Tribunal to order that the complainant bear all the costs he has incurred in bringing these proceedings.

CONSIDERATIONS

1. The complainant has filed three complaints (his fifteenth, sixteenth and nineteenth) concerned with facts which are part of the same continuum of events. However, the legal issues raised and the decisions impugned are partially discrete. Accordingly, the present complaint will not be joined with the others.

In the three cases, the complainant is, in substance, challenging the introduction of the new career system based on decision CA/D 10/14. The Tribunal has a principle that "the same question cannot be the subject of more than one proceeding between the same parties" (see Judgments 4530, consideration 7, and 3058, consideration 3). It is conceivable that one or more of the complaints could have been dismissed by application of that principle. However, the broad subject matter of each of the complaints is plainly a matter of fundamental importance to the staff of the EPO, including the complainant. In these circumstances, the Tribunal will address each of the complaints individually.

2. The Tribunal will not address the receivability issues raised by the Organisation since the complaint is unfounded on the merits.

3. Firstly, the Tribunal points out that the scope of the present complaint is the challenge to the May 2015 payslip insofar as it reflected the abolition of the automatic step advancement in the new career system introduced by the general decision CA/D 10/14 (see Article 48 of the Service Regulations, as amended by said general decision). The complainant also challenges the general decision to the extent that it introduces a new step advancement system no longer based automatically on seniority.

4. A number of the complainant's pleas concern procedural flaws that allegedly occurred at the "elaboration" stage of decision CA/D 10/14. He contends that:

(a) the General Consultative Committee (GCC) was not properly constituted, as it included Vice-Presidents, appointed by the President, allegedly in violation of Articles 1, 2, and 38 of the Service Regulations;

(b) the Vice-Presidents appointed to the GCC were also members of the Management Committee (MAC). Having regard to their role and responsibilities as members of the MAC, they lacked impartiality as members of the GCC. Indeed, the same persons participated in the elaboration of the contested reform at the highest level within the MAC and were consulted on the same reform as members of the GCC; in addition, their participation in the GCC curtailed the freedom of speech of the other members of the advisory body; and

(c) the rules on consultation were not properly followed; this plea is threefold:

– firstly, Articles 36(2) and 38(2) of the Service Regulations were violated; the Central Staff Committee (CSC) had submitted a "counter proposal" and requested on two occasions that it be examined by the GCC but to no avail. Indeed, the Chair of the GCC did not put it on the agenda;

– secondly, the CSC was not consulted, which deprived it of its main purpose, as described in Article 34(1) of the Service Regulations, that is "providing a channel for the expression of opinion by the staff"; and

– thirdly, the consultation with the GCC was not conducted in good faith considering that the GCC members (i) "lacked information on the impact of the reform"; (ii) "did not have access to all documentation on the reform"; and (iii) "had insufficient time to review the available documents and to discuss the reform".

5. The pleas regarding procedural flaws at the "elaboration" stage of the contested general decision are unfounded.

The Tribunal has already ruled on complaints regarding the appointment to the General Advisory Committee (GAC) – the consultative body that was later replaced by the GCC – of members who were either employed on contract (mostly Vice-Presidents) or members of the MAC, or both. Such disputes had been brought before the Tribunal by other members of the same GAC. The Tribunal held that "[t]he composition of an advisory body does not, except in cases involving manifest perversity, affect the prerogatives of that body. [...] Moreover, the appointment of the Administration's representatives as members of the GAC does not show any manifest perversity" (see Judgment 4322, consideration 9). This case law is applicable also to cases, like the present one, where the composition of the advisory body is challenged by a staff member who is not a member of such body.

In addition, the Tribunal does not accept the complainant's interpretation of Articles 1, 2, and 38 of the Service Regulations. Article 1(5) stated, at the relevant time, that:

> "[t]hese Service Regulations shall apply to the President and vice-presidents employed on contract only in so far as there is express provision to that effect in their contract of employment".

Article 2, under the heading "Bodies under the Service Regulations", included the GCC.

These provisions do not imply that Vice-Presidents as members of the MAC cannot be appointed to the GCC. Such a conclusion is contradicted by the same Article 38, regarding the GCC, which includes in its composition, in addition to all full members of the CSC, the President of the Office and a number of full members of her or his choice. As a result, the fact that the Service Regulations are not applicable to the President (Article 1) does not impede him from being the Chairman of the GCC (Article 38). This conclusion also applies to Vice-Presidents. Indeed, Article 38 provides that the President shall appoint to the GCC a number of full members of her or his choice, and does not expressly prohibit appointing Vice-Presidents.

As to the plea of lack of impartiality of the members of the MAC and of the Vice-Presidents, the Tribunal first recalls its case law stating it is a general rule of law that an official who is called upon to take a decision affecting the rights or duties of other persons subject to her or his jurisdiction must withdraw in cases in which her or his impartiality may be open to question on reasonable grounds. It is immaterial that, subjectively, the official may consider herself or himself able to take an unprejudiced decision; nor is it enough for the persons affected by the decision to suspect its author of prejudice (see Judgments 4240, consideration 10, and 3958, consideration 11). A conflict of interest occurs in situations where a reasonable person would not exclude partiality, that is, a situation that gives rise to an objective partiality. Even the mere appearance of partiality, based on facts or situations, gives rise to a conflict of interest (see Judgment 3958, consideration 11). However, an allegation of conflict of interest or lack of impartiality has to be substantiated and based on specific facts, not on mere suspicions or hypotheses. The complainant bears the burden of proof of conflict of interest (see Judgments 4617, consideration 9, and 4616, consideration 6), and, in the present case, he fails to discharge it. Indeed, the mere circumstance that GCC members are also Vice-Presidents and/or members of the MAC does not sustain a conclusion that they lack impartiality as members of the GCC, as there is no evidence that they had received any instructions from the President (see Judgment 4243, consideration 9).

The complainant relies on the "Terms of Reference of the MAC" which state that "[a]n agreement in the MAC, or a decision taken in the MAC by the President, has a binding effect on MAC members. MAC members are required to act in a way that is consistent with such agreements or decisions". This provision is not relevant in the present case. Indeed, even if it were proven that it was prepared by the MAC (and it is not), a draft reform cannot be considered "a decision" or "an agreement" taken in the MAC and having binding effects on its members.

With regard to the consultation process of the CSC, it is appropriate to recall that all full members of the CSC are also members of the GCC (see Article 38(1) of the Service Regulations). Therefore, even if the

failure to provide the information to the CSC itself is a legal flaw, it had no material consequences in the specific circumstances of the case, given that all its members were in fact in possession of that information as a consequence of their membership of the GCC.

Articles 36(2) and 38(2) of the Service Regulations respectively provide that:

(i) the CSC is in charge of making "suggestions" relating to the organisation and working of departments or the collective interests and of "examining any difficulties" of a general nature relating to the Service Regulations or any implementing Rules thereto and "addressing them" in the GCC; and

(ii) the GCC shall be consulted on any question which the Staff Committee has asked to have examined in accordance with the provisions of Article 36 and which is submitted to it by the President of the Office.

These rules make reference to "suggestions" and "questions" submitted by the CSC, but do not mean that whenever the GCC – composed also of the full members of the CSC – is consulted on a proposal, it is mandatory to put on the agenda a counter-proposal made by the CSC. Indeed, Article 38 confers on the President of the Office the power to select which questions are to be submitted to the GCC.

It must also be recalled that, as a matter of fact, on 10 October 2014, the first version of the draft reform was sent by the Office "for information" to all members of the GCC, that is to say also to its members who were at the same time full members of the CSC. The actual consultation took place one month later and the Tribunal is satisfied that this was a sufficient timespan to understand the meaning and the impact of the reform, taking also into account that, as a matter of fact, the Staff Committee members also participated in the discussions on the reform, in two working groups.

The plea related to the lack of good faith in consulting the GCC is also unfounded. A proper consultation took place in November 2014, and was preceded by the sending of the proposal, for information, in October 2014. The GCC was provided with the relevant documentation

and sufficient time (one month) in order to examine the proposal. The Tribunal reiterates that the proposal sent for information in October 2014 was preceded by discussions in working groups that lasted more than two years.

Lastly, the circumstance that the implementing circulars of the general decision were not submitted for consultation, does not affect either the lawfulness of the general decision, or the lawfulness of the individual decision. Firstly, the implementing circulars are not part of the general decision, and followed its adoption. Secondly, the core of the reform is contained in the general decision, and the complainant does not articulate the further adverse effect of the implementing circulars on the individual decision, other than the one already stemming from the general decision.

6. A further number of the complainant's pleas are concerned with procedural flaws that allegedly occurred at the "adoption" stage of decision CA/D 10/14. He contends that:

(a) the Organisation misled the representatives of Contracting States by giving them imprecise information, of which he offers to the Tribunal several examples, related to the way the Organisation depicted the attitude of the staff representatives towards the reform, and described the financial advantages of the reform and the aspects of the former career system;

(b) after the consultation with the GCC, the Organisation submitted to the Administrative Council a revised version of the proposal, which had never been submitted to the GCC; and

(c) the Administrative Council abused its authority by approving Article 48(2) of the Service Regulations. Based on the European Patent Convention (EPC), the Administrative Council is competent to adopt or amend the Service Regulations, the salary scales, and "the nature of any supplementary benefits and the rules for granting them" (Article 33(2) of the EPC), and cannot delegate this competence to the President of the Office. The President has only managerial competence and is allowed to decide on the promotion of staff members but not on the step advancement system. In breach

of the EPC, the Administrative Council approved Article 48(2), which entrusts the President of the Office with the power to lay down further terms and conditions for step advancement. The President of the Office, pursuant to Article 48(2), established additional conditions for step advancement, by merging the budget for promotion and step advancement, and by establishing "quotas", that is a financial ceiling limiting the granting of steps.

7. The plea of misrepresentation and misleading information is unfounded. An accusation of bad faith must be proven and the complainant bears the burden of proof. In the present case, there is no persuasive evidence that the Organisation intentionally submitted false or imprecise information to the Contracting States in order to mislead them. In addition, even if misleading information had been provided to the representatives of the Contracting States, there is no evidence from which it could be inferred that this had any bearing on the actual decision made.

The second plea, summarized in consideration 6(b) above, is also unfounded. The proposal submitted to the Administrative Council differs from the one submitted in November 2014 to the GCC only in minor editorial modifications, and therefore there was no need to consult again with the GCC. In addition, the complainant has neither alleged nor proven that the two proposals were substantially divergent with regard to the new step advancement system, to his detriment.

The third plea, regarding the approval of Article 48(2) of the Service Regulations, is unfounded as well.

Article 33(2) of the EPC vests the Administrative Council, inter alia, with the competence to adopt or amend the Service Regulations and to establish the nature of any supplementary benefits and the rules for granting them. The power to adopt the rules cannot be delegated to the President of the Office, but in the present case the Administrative Council did not delegate such power to the President. Article 48 of the Service Regulations, as amended by the contested general decision, in paragraph 1 states: "Within the budgetary limits available, depending on performance and demonstration of the expected competencies, an

advancement of up to two steps in grade may take place every year". Paragraph 2 adds: "The appointing authority may lay down further terms and conditions for step advancement".

Article 48(2) does not authorise the President to establish further rules on step advancement conditions, as it must be interpreted in connection with Article 48(1) and in its framework. The "further terms and conditions", which are in the power of the President, must be construed as implementing requirements within the financial limit and the requirements of performance and demonstration of the expected competencies, already established in paragraph 1. The President is not entitled to establish requirements other than performance and expected competencies. In the present case, the President did not establish a financial ceiling by his own motion, as the budgetary limit was already provided for by Article 48(1). Article 48(2) of the Service Regulations is therefore consistent with Article 10(2)(a) of the EPC, pursuant to which the President "shall take all necessary steps to ensure the functioning of the European Patent Office". This provision endows the President with wide discretion to choose among different solutions based on the evaluation of the various relevant public and private interests at stake (see Judgment 4316, consideration 12).

8. By a further plea, the complainant contends that the new step advancement system infringed an acquired right. He alleges that in the former system he had a right to an automatic step advancement based on seniority, whilst in the new career system step advancement is based on performance and assessment of competencies. He concludes that the former automatic step advancement was a fundamental and essential term of employment in the meaning of the Tribunal's case law on acquired rights. Namely, he recalls that Judgment 832 lays down three elements to be considered: the nature of the altered term; the reason for change; and the consequences on staff pay and benefits.

This plea must be rejected. According to the Tribunal's case law, established for example in Judgment 61, clarified in Judgment 832 and confirmed in Judgment 986, the amendment of a provision governing an official's situation to her or his detriment constitutes a breach of an

acquired right only when such an amendment adversely affects the balance of contractual obligations, or alters fundamental terms of employment in consideration of which the official accepted an appointment, or which subsequently induced her or him to stay on. In order for there to be a breach of an acquired right, the amendment to the applicable text must relate to a fundamental and essential term of employment. Judgment 832, consideration 14, details a three-part test for determining whether the altered term is fundamental and essential. The test is as follows:

(1) The nature of the altered term: "It may be in the contract or in the Staff Regulations or Staff Rules or in a decision, and whereas the contract or a decision may give rise to acquired rights the regulations and rules do not necessarily do so."

(2) The reason for the change: "It is material that the terms of appointment may often have to be adapted to circumstances, and there will ordinarily be no acquired right when a rule or a clause depends on variables such as the cost-of-living index or the value of the currency. Nor can the finances of the body that applies the terms of appointment be discounted."

(3) The consequence of allowing or disallowing an acquired right and the effect it will have on staff pay and benefits, and how those who plead an acquired right fare as against others.

In addition, as the Tribunal observed in Judgment 4028, consideration 13, international civil servants are not entitled to have all the conditions of employment or retirement laid down in the provisions of the staff rules and regulations in force at the time of their recruitment applied to them throughout their career and retirement. Most of those conditions can be altered though depending on the nature and importance of the provision in question, staff may have an acquired right to its continued application.

In the present case:

(1) the step advancement system was established by the Service Regulations, which are part of the terms of employment of the staff members, as individual contracts refer to the Service Regulations;

(2) the reason for the change was clearly explained by the Organisation and does not appear to be unreasonable, as the previous system based on seniority resulted in a "career plateau" at an early age and could be detrimental to motivation and performance; the appropriateness of the change was confirmed by subsequent actuarial and financial studies; and

(3) the step advancement system was not suppressed, but only modified in its requirements: it is no longer based on mere seniority, but, instead, on the appraisal of performance and expected competencies.

The previous salary (which also resulted from previous step advancements) has been preserved by the transitional provisions (see Article 55(2) of CA/D 10/14 decision, that reads: "No reduction in basic salary shall result from the transposition").

Opportunities for future step advancement are not precluded to staff members. Nor did the complainant prove that the new system makes it impossible or unreasonably difficult to achieve a step advancement based on appraisal of performance and on expected competencies. Even though the new system is not automatic, neither is it left to an unfettered discretion. Indeed, it is based on performance and expected competencies, which are to be assessed according to an objective appraisal system.

In these circumstances, there is no breach of acquired rights, as the former salary is preserved, and future step advancements are not precluded. There is no unreasonable alteration of the balance of contractual obligations, as the step advancement is related to the discharge of the staff members' obligations. There is no alteration of the fundamental terms of employment in consideration of which the official accepted the appointment (see Judgment 4274, considerations 16 to 18, for a similar reasoning in a similar situation).

9. The complainant further submits that the contested decision breached his legitimate expectations; he alleges that automatic step advancement had existed since the creation of the Office and had been applied for more than forty years. It was therefore a well-established practice, which he legitimately expected to continue. The former system was foreseeable, stable and transparent, whilst the new one is

subject to the EPO's finances and to the powers of the appointing authority, and therefore is not foreseeable, stable and transparent.

The Tribunal observes that it is not appropriate to raise an issue of legitimate expectations based on practice, as in the present case the previous automatic step advancement was not based on a practice, but instead on an express Service Regulation (former Article 48). Thus, in this case, the issue of the alleged infringement of legitimate expectations is not separate, in fact, from the one regarding the breach of acquired rights. Therefore, for the same reasons as those given above concerning the issue of acquired rights, the plea is unfounded.

The further contention that the new step advancement mechanism lacks transparency, foreseeability and stability, is unproven and unsubstantiated. The mere fact that step advancements are based on performance does not render them arbitrary or not transparent. The reference made by Article 48(1) to performance and expected competencies as requirements for step advancements entails that the periodic step advancements must be based on a performance appraisal system, established prior to the periodic specific assessment for step advancement. One would expect that the eligibility criteria for step advancements would be established in advance so that staff members are placed in a situation to know the requirements and to discharge their obligations accordingly. Article 48(2), in vesting the President with the power to establish terms and conditions, requires that the President clarify in advance, by means of implementing decisions, the criteria for assessing performance and expected competencies in order to achieve the step advancement.

As to the budgetary constraint, it is a natural limit in any organisation, and it does not make the step advancement unforeseeable.

10. In his last plea, the complainant alleges a breach of the Organisation's duty of care, submitting that:

(a) the Organisation failed to inform staff members in a timely manner of the content and consequences of the reform; staff received information only 15 days before the entry into force of the reform; and

(b) the Organisation failed to mitigate the negative consequences of the reform on the staff members; it had the authority to adopt transitional or mitigating measures and failed to do so.

The plea is unfounded. The fact that staff members were informed only 15 days before the entry into force of the reform had no material consequences, considering that no action was required of them prior to its implementation. The transitional measures included in the reform of the career system fall within the discretion of the Organisation, do not appear unreasonable and cannot therefore be annulled by the Tribunal. In any case, it is not within the Tribunal's purview to impose different transitional measures.

11. The complainant requests to be awarded moral damages for the alleged undue delay in the internal appeal proceedings. This claim is not supported by specific pleas and allegations. In the present case, the impugned decision has already awarded the complainant 700 euros for the length of the internal appeal procedure, including the time that elapsed following the deliberations of the Appeals Committee. The complainant does not substantiate before the Tribunal that his injury warrants a higher amount. As a result, this claim should be rejected.

12. In conclusion, all the complainant's pleas are unfounded and therefore all his claims should be rejected.

DECISION

For the above reasons,

The complaint is dismissed.

In witness of this judgment, adopted on 23 May 2023, Mr Michael F. Moore, President of the Tribunal, Mr Patrick Frydman, Vice-President of the Tribunal, and Ms Rosanna De Nictolis, Judge, sign below, as do I, Dražen Petrović, Registrar.

Delivered on 7 July 2023 by video recording posted on the Tribunal's Internet page.

MICHAEL F. MOORE

PATRICK FRYDMAN

ROSANNA DE NICTOLIS

DRAŽEN PETROVIĆ