IN THE SUPREME COURT OF THE STATE OF NEVADA

J.W. BENTLEY; MARYANN BENTLEY, TRUSTEES OF THE BENTLEY FAMILY 1995 TRUST; JOY SMITH; DANIEL BARDEN; AND ELAINE BARDEN,

Appellants,

vs.

STATE OF NEVADA, OFFICE OF THE STATE ENGINEER; DONALD S. FORRESTER AND KRISTINA M. FORRESTER; HALL RANCHES, LLC; THOMAS J. SCYPHERS AND KATHLEEN M. SCYPHERS; FRANK SCHARO; SHERIDAN CREEK EQUESTRIAN CENTER, LLC; AND RONALD R. MITCHELL AND GINGER G. MITCHELL,

Respondents.

No. 64773

J.W. BENTLEY; MARYANN BENTLEY, TRUSTEES OF THE BENTLEY FAMILY 1995 TRUST; JOY SMITH; DANIEL BARDEN; AND ELAINE BARDEN,

Appellants,

vs.

HALL RANCHES, LLC; THOMAS J. SCYPHERS AND KATHLEEN M. SCYPHERS; FRANK SCHARO; SHERIDAN CREEK EQUESTRIAN CENTER, LLC, A NEVADA LIMITED LIABILITY COMPANY; DONALD S. FORRESTER AND KRISTINA M. FORRESTER; RONALD R. MITCHELL AND GINGER G. MITCHELL,

Respondents.

No. 66303

J.W. BENTLEY; MARYANN BENTLEY, TRUSTEES OF THE BENTLEY FAMILY 1995 TRUST;

Appellants,

vs.

THE STATE OF NEVADA STATE ENGINEER; HALL RANCHES, LLC; THOMAS M. SCYPHERS; KATHLEEN M. SCYPHERS; FRANK SCHARO; SHERIDAN CREEK EQUESTRIAN CENTER, LLC; RONALD R. MITCHELL; AND GINGER G. MITCHELL,

Respondents.

No. 66932

INTERVENORS' ANSWER TO APPELLANTS' PETITION FOR REHEARING

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INTERVENORS' ANSWER TO APPELLANTS' PETITION FOR REHEARING

COME NOW Respondents DONALD S. FORRESTER and KRISTINA M. FORRESTER, HALL RANCHES, LLC, a Nevada Limited Liability Company, THOMAS J. SCYPHERS and KATHLEEN M. SCYPHERS, FRANK SCHARO, SHERIDAN CREEK EQUESTRIAN CENTER, LLC, a Nevada Limited Liability Company, RONALD R. MITCHELL and GINGER G. MITCHELL (collectively the "Intervenors"), by and through their counsel, THOMAS J. HALL, ESQ., and pursuant to the Court's Order of September 22, 2016, and NRAP 40, file their Answer to Appellants' Petition for Rehearing which was filed herein on July 29, 2016 (the "Petition").

III. Procedure.

The Appellants have not followed the proper procedures set forth in NRAP Rule 40 regarding petitions for rehearing. Specifically, Appellants failed to comply with NRAP Rule 40(c)(1) which provides as follows:

> (c) Scope of application; when rehearing considered.
>
> (1) Matters presented in the briefs and oral arguments may not be reargued in the petition for rehearing, and no point may be raised for the first time on rehearing. [Emphasis added.]

And, in addition, NRAP 40(a)(2) provides in pertinent part as follows:

> (2) *Contents*. . . . Any claim that the court has overlooked or misapprehended a material fact shall be supported by a reference to the page of the transcript, appendix or records where the matter is to

> be found; any claim that the court has overlooked or misapprehended a material question of law or has overlooked, misapplied or failed to consider controlling authority shall be supported by a reference to the page of the brief where petitioner has raised the issue. [Emphasis added.]

This Court has held that a party may not raise a new point for the first time on rehearing. Stanfield v. State, 99 Nev. 499, 501, 665 P.2d 1146, 1147 (1983). A petitioner may neither reargue an issue already raised nor raise new issues not raised previously. In re: Herrmann, 100 Nev. 149, 151, 679 P.2d 246, 247 (1984). Ducksworth v. State, 114 Nev. 951, 953, 966 P.2d 165, 166 (1998). Here, the Petition contains so many duplicative, mind-numbing arguments without reference to any briefs, the Intervenors are hard pressed to determine which arguments presented by the Bentleys support the points of law or fact which in their opinion this Court has overlooked or misapprehended. Be that as it may, Intervenors offer the following answering points.

IV. The Court Properly Considered and Rejected all of Bentleys' Current, Newly Reworded and Reworked Arguments.

A. The Rotation Schedule.

The rotation schedule issued by the district court and implemented by the State Engineer was considered and approved by this Court in its original decision. The Order of Affirmance entered herein on July 14, 2016 (the "Order"), pages 6-10, provide a detailed exposition of how the Court considered the issue of the court-imposed rotation schedule, stating as follows (Order, p. 10):

> The Bentleys argue that because NRS 533.075 only authorized the imposition of a rotation schedule to situations where all of the water users agree to it, the district court had no authority to impose an involuntary rotation schedule. However, while it is true that NRS 533.075 only explicitly authorizes voluntary rotation schedules, it also does *not* limit the power of the district court to impose an otherwise involuntary rotation schedule after the jurisdiction of the district court has been properly invoked. [Emphasis added.]

The three points raised in support of rehearing on the rotation schedule include: the number of users in favor of rotation, the mixed use of the water and lack of evidence supporting an "efficient rotation schedule." All three arguments were previously and thoroughly presented and discussed in the Bentleys' Opening Brief ("AOB"). (AOB, pp. 16-21.)

1. **Statutory and Equitable Remedies.** The factual record established in the lower court fully sustains the need for a court-ordered rotation system for water diversion during periods of low flow. The Bentleys argument that "forced rotation is not a statutory remedy" is wholly misplaced. In fact, the provisions of NRS 533 do not prohibit court-ordered rotation and this Court directly addressed Bentleys' argument as shown above. In fact, the Bentleys spent 5 pages in their Opening Brief discussing this very issue. (AOB, pp. 16-21.)

NRS 533.075 allows the parties to agree to a rotation schedule, as was done prior to construction of the Bentleys' new and larger pond, and in no way limits the "power of the district court to impose an otherwise involuntary rotation schedule." Order, p. 10. Furthermore, the Bentleys now contradict the argument they

previously made when they declared in their Opening Brief that "NRS 533.220(1) confirms that the distribution of adjudicated water rights remains under the jurisdiction of the District Court . . . ." (AOB, p. 23, ll. 6-7.) Simply, the facts and legality of the court-ordered rotation have not been overlooked or misapprehended by this Court. Rotation of use of water to protect water right owners is simply not a matter of majority rule. If one or more Intervenors call for and require rotation to actually receive their prorated water during times of low flow, they are allowed to and deserve to insist on rotation.

Further, this Court is not obligated to rule on "what-if" questions. "This court will not render advisory opinions on moot or abstract questions. Decisions may be rendered only where actual controversies exist." Applebaum v. Applebaum, 97 Nev. 11, 12, 621 P.2d 1110, 1110 (1981); State Engineer v. Truckee-Carson Irrig., 116 Nev. 1024, 1032, 13 P.3d 395 (2008); Marquis & Aurbach v. Dist. Ct., 122 Nev. 1147, 1162 n.32, 146 P.3d 1130, 1140 n.32 (2006) (citing University of Nevada v. Tarkanian, 95 Nev. 389, 394, 594 P.2d 1159, 1162 (1979), for the proposition "that duty of this court is to resolve actual controversies and not to opine on moot questions or abstract propositions"). The Bentleys should be aware of this standard as this is precisely the basis for the previous dismissals of Bentleys' Cases 56351, 56551 and 59188 by this Court.

2. **Mixed Use of Water.** In their Opening Brief, the Bentleys state:

> The rotation schedule compels Bentley to cease using his stock, wildlife, and recreation rights, except during specified periods . . . thereby violating the restrictions on the decreed place and manner of use." (AOB, p. 23, l. 22 – p. 24, l. 3.)

The argument raised again in the Petition is that the "order of Affirmance allows a rotation schedule to mix different uses." (Petition, p. 6.) The footnote on page 6 references the Bentleys' recreation water permits of which this Court took judicial notice. Permit 84310 plainly states as follows:

> The amount of water to be transferred shall consist of the full flow of the northern split of Sheridan Creek and the commingled waters of Stutler Canyon Creek and Gansberg Spring in a rotation scheme of distribution. This water may be diverted during the time allotted to said Proof V06306, consisting of 12.93 acres of water-righted ground. This permit is issued subject to the approval of the modified irrigation rotation schedule by the Ninth Judicial District Court of the State of Nevada In and For Douglas County, Case No.: 08-CV-0363-D, Dept. No. 1. These rights may be placed to use on the Bentley parcel and are subject to the same sharing agreement as set forth in the irrigation schedule mentioned above. Further these rights may be shared as set forth under the modified rotation schedule.

Not only have the Bentleys already made this argument, but it is completely illogical to "what-if" future lawsuits because water used by the Bentleys for recreation then flows downstream and is used by an Intervenor for irrigation. Presumably, the only lawsuit filed would be filed by the Bentleys themselves. However, as previously stated, abstract theory and speculation are not appropriate grounds for rehearing.

3. **Evidence of an Efficient Rotation Schedule.** In their Opening Brief, the Bentleys state:

> "There is no indication that the State Engineer considered any variations of the rotation schedule . . . ." (AOB, p.24, ll. 24-25.)

And again, in their Petition, the Bentleys argue that "there was no evidence presented regarding an efficient rotation schedule." (Petition, p. 6). Without implementation of a rotation schedule, because of superior, geographic location of the Bentleys' property, the Bentleys are able to divert the entire flow of water during times of shortage and drought, thereby depriving the Intervenors of all water during those periods. The Bentleys contradict their own arguments, stating in their Opening Brief, "Although the maintenance of Bentley's ponds during a drought may require greater rights than have been adjudicated in their favor, Bentley would simply have to curtail its usage in that event." (AOB p. 19, ll. 6-9). It appears that the Bentleys' argument is that they are entitled to more rights and a higher priority than the other vested water right holders. If the Bentleys need to use more water than they own in times of drought, where will they obtain the amount of "greater rights" to maintain their ponds? The downstream users have the same priority water rights as the Bentleys. Why should any of their rights be subordinate to the Bentleys?

The Intervenors are water users downstream from the Bentleys' two ponds and from the Smith and Barden pipe diversion. The principal diversion, on the

uphill side of the collective properties, at all times delivers a four-inch water pipeline full of water to the Smith and Barden properties. 6 SA 1051; 1 TR 95:13–96:1; 6 SA 1057; 1 TR 117:5-9; 1 TR 117:24-118:12. Substantial evidence presented during trial and noted in the Respondents' Answering Brief ("RAB"), supports the district court's order for rotation and the State Engineer's implementation of the rotation schedule, as an officer of the Court, during times of low flow. 6 SA 1070; 1 TR 172:13-21. In fact, there had been a prior and informal rotation agreement with the surrounding neighbors before the construction of Bentleys' second pond and before the formal rotation schedule was implemented by the district court. 8 SA 1559.

During the implementation of a rotation schedule, the Intervenors' irrigation water supply was greatly enhanced. Intervenor Frank Scharo, a downstream water user, testified to such, 6 SA 1070; 1 TR 172:13-21:

> Q. How do you irrigate your property?
>
> A. [I] irrigate the property through the Park and Bull Ditch to the north and from Sheridan Creek waters to the south.
>
> Q. What is the history of irrigating your property as you know it? How does the water get to your property?
>
> A. Well, we've had an informal rotation agreement with the surrounding neighbors and water flows up to the southern portion from the Forresters' ranch.

After implementation of the 2010 rotation schedule, the downstream users received their fair share of water and had a good year. Mr. Forrester further testified that the change was immense - double or triple the water flow - after implementation of the rotation schedule, 6 SA 1057; 1 TR 117:5-9; 1 TR 117:24-118:12:

> Q. So [in] 2010 the court imposed a rotation schedule by court order and you're describing what changes were effective?
>
> A. It was a huge change, I had enough water to ditch irrigate, to be able to flood the ditches.
>
> * * *
>
> Q. How much more water would you estimate?
>
> A. Double or triple.
>
> Q. Double or triple the water?
>
> A. Yes.
>
> Q. On rotation as opposed to the previous year with no rotation?
>
> A. Yes.
>
> Q. Okay. Was 2010 a real wet year, a dry year, a medium year?
>
> A. I think it was a medium year.
>
> Q. So you had two to three times amount of water coming through your irrigation system on rotation on an average year, average water year?
>
> A. Yes.

Intervenor Tom Scyphers testified that there was an informal rotation method in place to irrigate the Intervenors' property and that "We strictly were on an informal rotation ever since I've owned the property." 6 SA 1127; 2 TR 287:7-10.

This testimony was not lost on this Court, stating in its Order (Order, p. 13):

> At trial, the Intervenors testified that the Bentleys' combined ponds use significantly more water than the previous single pond, resulting in the downstream users receiving no water during times of low flow.

As the testimony presented in district court has shown, the court ordered rotation allowed the downstream users to obtain their equal priority water in rotation whereas after construction of the second pond they had not been able to obtain their equal priority water during drought or water shortage. There are no facts or law which have been overlooked or misapprehended by this Court which warrant a rehearing in this matter.

B. <u>Seepage Tests and the Diversion Agreement.</u>

Neither the district court nor this Court misapprehended the relevance of the seepage tests. In their umpteenth attempt to reargue that which has been fully and completely addressed by this Court in its Order, the Bentleys have reworded the evidence shown by the seepage tests at pages 7-10 of their Petition. This point was previously set forth and argued in the Bentleys' Opening Brief. (AOB, pp. 32-35.) Re-argument of this issue is not allowed. NRAP 40(c)(1). The Intervenors in their

Answering Brief, pages 20-24, cited ample evidence as to the factual support for the district court's order for rotation and the state engineer's implementation for the same. Bentleys' Reply Brief contested the consumptive use evidence. (ARB, pp. 15-16.) In their Petition, the Bentleys demonstrate through mathematical computation that they own or control a substantial quantity of water, reputedly 51.72 AFA. However, the Bentleys miss the point that during times of low flow and on occasion, the Intervenors received no water delivery even though they hold water rights with equal priority. During periods of scarce supply, such as when the flow diminishes to below 2.0 cfs as recognized by the State Engineer and the district court, the Bentleys use more than their fair share of water rights. Rotation is not only appropriate but required. Rhetorically it may be asked, when do the Intervenors, who hold ample water rights themselves, receive their water in times of low flow if the Bentleys receive 100% or more of their water and the Intervenors receive none of their water, particularly when all users have the same priority?

The "simple" computations put forth by the Bentleys on page 9 and 10 of the Petition only demonstrate that in times of low flow, not all water right holders receive their entire right. There simply is not enough water in times of low flow to allow every holder their full water rights, regardless of what rights they hold on paper. Therefore, a rotation system is the only equitable and fair method of

distribution, which was previously determined by the district court and implemented by the State Engineer.

C. Facts and Law Regarding the Lack of Rolphs' Signatures on the Diversion Agreement.

The Bentleys fail to cite by reference to the pages in their previously filed briefs where they first raised this issue. NRAP 40(a)(2). If they had done so, it would be clear that this matter has been adequately briefed by the Bentleys and thoroughly responded to by the Intervenors. The Bentleys should have recognized that this Court has not overlooked or misapprehended any issue relating to the Diversion Agreement. (See, AOB, pp. 35-38.) The Bentleys are prohibited from re-arguing the matter of the Rolphs' missing signatures on the Diversion Agreement as they presented that issue in depth in both their Opening and Reply Briefs and have failed to specify which facts or law were misapprehended or overlooked by this Court. (AOB pp. 35-38 and ARB pp. 16-19.) Restating that the Rolphs' "signature was not necessary for an agreement that impacted the North Branch of Sheridan Creek" (ARB, p. 19), as the Rolphs were "not necessary parties to the agreement between the Whitmires and Lodato," (Petition, p. 12), completely ignores the discussion and conclusion reached by this Court when it stated as follows (Order, p. 19):

> The Bentleys argue that because the Whitmires, not the Rolphs, had the rights to North Sheridan Creek, the diversion agreement is valid as to the waters of North Sheridan Creek, even though the Rolphs did not

> sign it. However, in order for there to be a valid contract formation, there must be a meeting of the minds. [Emphasis added.]

If the Rolphs' signatures were unnecessary, then the Whitmires and Lodato could have easily created a revised agreement and recorded that document rather than recording the defective Diversion Agreement lacking the Rolphs' signatures.

The Bentleys' attempt to split hairs over the difference in arguing that the Rolphs' signatures were unnecessary and arguing that the Rolphs were not necessary parties to the Agreement which is simply re-constituted in their Petition as an issue of severability. The point is the same and has been addressed by this Court in the Order. Although the Bentleys have not previously presented a succinct severability argument (which is still disallowed under the rules for rehearing), the basis of the Bentleys' argument is the same – the Rolphs were not necessary parties; thus, their signatures were not necessary on the Agreement. The conclusion reached by this Court as well as the district court is the same. All of the Grantors named in the Diversion Agreement, namely the Rolphs, did not sign the document. As a result, this Court held the Diversion Agreement was not a valid contract and that the "agreement does not contemplate any additional, separately held water rights by the two grantors who signed the agreement." (Order, p. 20.) It stands to reason that if the Agreement is not a valid contract, then it is also not valid as to Lodato and the Whitmires, no matter how the Bentleys attempt to reword their argument.

Whether severability is considered a new argument or a mere reformation of the Bentleys' previous argument, both versions disallowed on rehearing, there are clearly no facts or law misapprehended or overlooked by this Court and no basis for a rehearing on this issue. Rehearing should be denied.

D. Attorney Fees.

Lastly, the district court and this Court correctly apprehended the facts and law regarding the award of attorney fees.

The district court was confronted with a rare but significant situation where the Bentleys, through their immense wealth and superior geographic position, attempted to harass and financially exhaust the Intervenors. The district court made this point clear when it found the following (5 SA 984):

> 44. Mr. Bentley, through intimidation and threat, attempted to bully the Intervenors, acting in a manner to harass and financially exhaust the Intervenors.
>
> 45. [The] Bentleys brought and maintained their Exception No. 1 relating to the Diversion Agreement without reasonable grounds.
>
> 46. The Diversion Agreement contains a clause that allows attorney fees to the prevailing party in the event a lawsuit is brought to enforce or interpret the Agreement.
>
> 47. [The] Bentleys asserted that the Agreement dated August 5, 1986, and the letter recorded August 6, 1986, granted an additional right to divert the flow of Sheridan Creek through the ponds. (Exhibit 7). However, those documents did not grant any additional rights and are invalid.

48. The Bentleys proceeded in this matter under an erroneous theory and under an erroneous thought process, and therefore, their action was maintained by them without reasonable grounds.

On January 4, 2013, the district court entered its Order granting Intervenors a portion of the $171,814 of attorney fees which were sought post-trial and awarded them fees in the amount of $90,000 as a sanction and all costs in the amount of $7,127.05. 4 SA 825.

The award of attorney fees was authorized by the April 5, 2012, Findings of Fact which Findings were included in the Decree. Findings of Fact, 5 SA 987, ¶ 19 and ¶ 20; 5 SA 848, 974-990.

The contest to the district court's award of attorney fees was presented by the Bentleys in their Opening Brief filed April 3, 2015. (AOB, pp. 42-49.) The Bentleys are not allowed to again present these arguments on rehearing. NRAP 40(c)(1). All necessary support to sustain the award of attorney's fees was presented in the Intervenors' Answering Brief on pages 50-56. Nothing has changed. The obligation for fees has been incurred and to insinuate otherwise is subterfuge. Thomas J. Hall, Esq., never acted in proper person and the award of attorney fees in favor of the Intervenors still remains outstanding and must be paid by the Bentleys. The matter was sufficiently addressed by the district court and thoroughly by this Court in pages 25-28 of its Order. The Bentleys have raised no new points, as with all their other claims, and are merely rearguing points that have

already been fully briefed and denied. The fantasy concocted by the Bentleys that the Intervenors are only obligated to pay minimal costs and the overhead for a law clerk in a case that this law firm has been litigating for over seven years, is not only absurd and ridiculous, but offensive and impertinent. To outlandishly claim that this law firm has "conceded the Bentleys' argument" that there is no obligation to the Intervenors to pay the fees and costs incurred, demonstrates the exact harassing behavior constantly perpetuated by the Bentleys throughout this entire case and outlined in NRS 18.010(2)(b):

> (2) In addition to the cases where an allowance is authorized by specific statute, the court may make an allowance of attorney's fees to a prevailing party:
>
> * * *
>
> (b) Without regard to the recovery sought, when the court finds that the claim, counterclaim, cross-claim or third-party complaint or defense of the opposing party was brought or maintained without reasonable ground or to harass the prevailing party. The court shall liberally construe the provisions of this paragraph in favor of awarding attorney's fees in all appropriate situations. It is the intent of the Legislature that the court award attorney's fees pursuant to this paragraph and impose sanctions pursuant to Rule 11 of the Nevada Rules of Civil Procedure in all appropriate situations to punish for and deter frivolous or vexatious claims and defenses because such claims and defenses overburden limited judicial resources, hinder the timely resolution of meritorious claims and increase the costs of engaging in business and providing professional services to the public. [Emphasis added.]

The Bentleys have acted and continue to act in a manner intended to financially harass and exhaust the Intervenors, and they have nearly succeeded.

The Intervenors, though obligated to pay the attorney fees and costs incurred in this matter, are simply struggling to pay all of the billings as rendered by the Law Offices of Thomas J. Hall.

V. Conclusion.

It is obvious and true that the Bentleys have acted in a manner meant to exhaust and embarrass the Intervenors as amply demonstrated by the nature and number of appeals filed in this matter since entry of the Findings of Fact, Conclusions of Law and Judgment in the district court, which include the following:

Writ proceeding (Case No. 56531 – dismissed);
Appeal (Case NO. 56551 – dismissed);
Appeal (Case No. 59188 – dismissed);
Appeal (Case No. 60891 – dismissed);
Appeal (Case No. 64773 – Order of Affirmance);
Appeal (Case No. 66303 – Order of Affirmance);
Appeal (Case No. 66932 – Order of Affirmance); and
Appeal (Case No. 68913 – submitted to this Court).[1]

After many, many years of pleadings, hearings, petitions and appeals, the Nevada Supreme Court has entered its Order of Affirmance. The Bentleys, again in typical fashion, have filed the instant Petition and simply reargued previous issues addressed in this Court's Order, or alternatively, impermissibly raised new

[1] Neither Intervenors nor their counsel received any notice of the filing of the appeal in Case No. 68913 despite the fact that the appeal concerns findings made in district court case no. 08-CV-0363-D-1 in which the Intervenors were made real parties in interest.

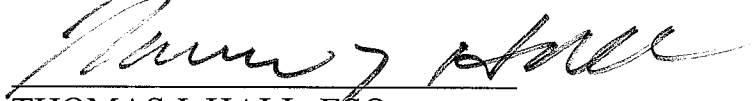
issues not previously set forth. The Order for Affirmance should stand and the Petition for Rehearing, which fails to demonstrate any material fact or material question of law which has been overlooked or misapprehended by this Court, or to cite any misapplication or failure to consider controlling authority, should be denied in its entirety.

In view of all of the above, the Bentleys should be ordered to pay additional sanctions to the Intervenors. See, In re Herrmann, 100 Nev. 149, 152, 679 P.2d 246, 247-48 (1984).

The undersigned does hereby affirm that the preceding document does not contain the social security number of any person.

DATED this 7th day of October, 2016.

LAW OFFICES OF THOMAS J. HALL



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VI. Attorney's Certification.

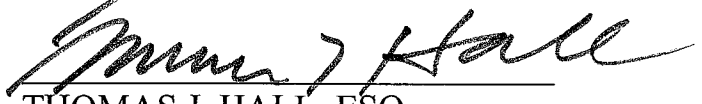
I hereby certify that this Answer complies with the formatting requirements of NRAP 32(a)(4), the typeface requirements of NRAP 32(a)(5) and the type style requirements of NRAP 32(a)(6) because it has been prepared in a proportionally spaced typeface using 14 point Times New Roman type style font in Microsoft Word 2010.

I further certify that this Answer complies with the type-volume limitations of NRAP 40 because it is proportionately spaced, has a typeface of 14 points or more and contains 4,595 words.

Finally, I certify that I have read this Answer, and to the best of my knowledge, information and belief, it is not frivolous or interposed for any improper purpose. This Answer complies with all applicable Nevada Rules of Appellate Procedure and I understand that I may be subject to sanctions in the event that the Answer is not in conformity with the requirements of the Nevada Rules of Appellate Procedure.

DATED this 7th day of October, 2016.

LAW OFFICES OF THOMAS J. HALL



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CERTIFICATE OF SERVICE

I certify that I am an employee of Thomas J. Hall, Esq., and that on this date, pursuant to NRAP 25(d), I electronically filed the foregoing document with the Clerk of the Court using the ECF system which served the following parties electronically:

Michael L. Matuska, Esq.
Jessica Prunty, Esq.
Bryan L. Stockton, Esq.

I further certify that I placed in the U.S. Mail, postage pre-paid, a true and correct copy of the foregoing document addressed to:

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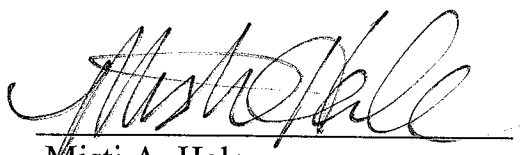
DATED this 7th day of October, 2016.



Misti A. Hale