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Sep 26 2018 09:24 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**IN THE SUPREME COURT FOR THE STATE OF NEVADA**

YOAV EGOSI,

Sup. Crt. No.: 76144

Appellant,

Dist. Crt. No.: D-16-540174-D

vs.

PATRICIA EGOSI,

Respondent.

**NOTICE OF FILING  
AMENDED CASE APPEAL  
STATEMENT, DOCKETING  
STATEMENT, AND  
REQUEST FOR  
TRANSCRIPT OF  
PROCEEDINGS AND  
RESPONSE TO ORDER TO  
SHOW CAUSE**

Comes Now Defendant, Yoav Egosi (“Joe”), through his attorney  
Alex Ghibaud, Esq. of the Law Office of Alex B. Ghibaud, PC, and files  
the instant notice of filing appeal documents and response to this Court’s  
order to show cause as follows:



## Memorandum of Points and Authorities

### **I. Appellant has filed the case appeal statement (amended), docketing statement, and request for transcript of proceedings pursuant to this Court's September 13<sup>th</sup>, 2018 order**

On September 13<sup>th</sup>, 2018 this Court filed the following order:

*Appellant shall have 15 days from the date of this order to file and serve the case appeal statement, docketing statement, and transcript request form. This court is unable to extend the time to file a notice of appeal except as provided in NRAP 4(c). Appellant shall have 30 days from the date of this order within which to show cause why this appeal should not be dismissed for lack of jurisdiction. Respondent may file any reply within 11 days from the date that appellant's response is served. Briefing is suspended.*

On September 10<sup>th</sup>, 2018 Appellant filed his amended notice of appeal and amended case appeal statement. On September 26<sup>th</sup>, 2018 Appellant filed his docketing statement and request for transcript of proceedings pursuant to this Court's order. Therefore, this pleading shall serve as notice that this Court's order concerning the case appeal statement, docketing statement, and request for transcript of proceedings has been satisfied.

### **II. Response to Order to Show Cause**

On June 11<sup>th</sup>, 2018, Appellant filed his first notice of appeal which stated the following: "COMES NOW the Defendant, Yoav Egosi...and appeals to the Supreme Court of Nevada that the district court's May 29, 2018 order denying his motion to reconsider." As this Court indicated in its



1 September 13<sup>th</sup>, 2018 order “the judgment or order designated in the notice  
2 of appeal is not substantively appealable.

3  
4 Though the notice of appeal referenced the denial of his motion to  
5 reconsider before the district court, the appeal actually sought to challenge  
6 the district court’s decision concerning Respondent’s motion to invalidate  
7 the parties’ prenuptial agreement. That decision was rendered after a two (2)  
8 bench trial on June 14<sup>th</sup>, 2017. Prior counsel failed to draft and submit an  
9 order memorializing the district court’s decision. Thus, when the notice of  
10 appeal was filed, it was premature.  
11

12  
13 On September 4<sup>th</sup>, 2018 the district court filed its order granting  
14 Respondents motion to invalidate the parties’ prenuptial agreement, in part.  
15 On September 4<sup>th</sup>, 2018, notice of entry of that order was filed. On  
16 September 10<sup>th</sup>, 2018 an amended notice of appeal and amended case appeal  
17 statement was filed in the district court referencing the challenged order as  
18 the order filed September 4<sup>th</sup>, 2018. Thus, the jurisdictional defect identified  
19 by this Court has been cured.  
20  
21

22  
23 On September 18<sup>th</sup>, 2018 Appellant filed his motion to certify the  
24 September 4<sup>th</sup>, 2018 judgment as final, in addition to a request that the  
25 proceedings below be stayed pending appeal. (See attached motion). That  
26  
27  
28

1 motion is set to be heard on October 18<sup>th</sup>, 2018. An ex parte application for  
2 an order shortening time has been prepared and will very shortly be filed.

3 **III. Conclusion**

4  
5 The defects identified by this Court have been cured. In addition, a  
6 motion to certify the challenged judgment is pending before the district  
7 court, which addresses another potential jurisdictional defect. As such,  
8 Appellant prays this Court does not dismiss his appeal.  
9

10 DATED this 24<sup>th</sup> day of May, 2018.  
11

12  
13  
14 /s/ Alex Ghibaud

15 ALEX B. GHIBAUDO, Nevada Bar No. 10592

16 **ALEX B. GHIBAUDO, PC**

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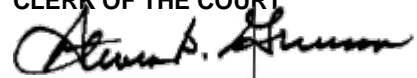
21 Email: alex@abgpc.com

22 *Attorney for Appellant*  
23  
24  
25  
26  
27  
28





# EXHIBIT 1



**MOT**

Alex Ghibaud, Esq.

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*Attorney for Defendant*

**DISTRICT COURT, FAMILY DIVISION  
CLARK COUNTY, NEVADA**

PATRICIA EGOSI,

Plaintiff,

vs.

YOAV EGOSI,

Defendant.

Dist. Ct. No.: D-16-540174-D

Dist. Ct. Dept.: Q

**MOTION TO CERTIFY THE  
ORDER FILED SEPTEMBER  
7, 2018 AS FINAL UNDER  
NRCP 54(b) AND MOTION TO  
STAY THESE  
PROCEEDINGS PENDING  
APPEAL**

**HEARING REQUESTED**

**NOTICE: YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO THIS  
MOTION/COUNTERMOTION WITH THE CLERK OF THE COURT AND TO  
PROVIDE THE UNDERSIGNED WITH A COPY OF YOUR RESPONSE WITHIN  
TEN (10) DAYS OF YOUR RECEIPT OF THIS MOTION/COUNTERMOTION.  
FAILURE TO FILE A WRITTEN RESPONSE WITH THE CLERK OF THE  
COURT WITHIN TEN (10) DAYS OF YOUR RECEIPT OF THIS  
MOTION/COUNTERMOTION MAY RESULT IN THE REQUESTED RELIEF  
BEING GRANTED BY THE COURT WITHOUT HEARING PRIOR TO THE  
SCHEDULED HEARING DATE**

Comes Now Defendant, Yoav Egosi ("Joe"), through his attorney  
Alex Ghibaud, Esq. of the Law Office of Alex B. Ghibaud, PC, and files





1 the above titled motion requesting the following relief:

2 **RELIEF REQUESTED**

- 3 1. That this court certify the judgment entered on September  
4 7, 2018 as final;  
5 2. That this court stay these proceedings pending  
6 Defendant's appeal; and  
7 3. For such other relief as this court deems just and equitable.

8 This motion is based upon the following Memorandum of Points and  
9 Authorities, including the affidavits and documents previously filed, the  
10 papers and pleadings on file herein, and any oral argument permitted at the  
11 time of the hearing.

12 DATED this 17<sup>th</sup> day of September, 2018.

13 /s/ Alex Ghibaud

14 ALEX B. GHIBAUDO, Nevada Bar No. 10592

15 **ALEX B. GHIBAUDO, PC**

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21 *Attorney for Defendant*





**NOTICE OF MOTION**

**TO: ALL PARTIES & COUNSEL OF RECORD**

**NOTICE IS HEREBY GIVEN** that the undersigned will bring the above and foregoing Motion on for hearing on the **18<sup>th</sup>** day of **October**, 2018, at the hour of \_\_\_\_m. in Department Number Q of the above-entitled Court, or as soon thereafter as counsel may be heard.

DATED this 17<sup>th</sup> day of September, 2018.

/s/ Alex Ghibaud

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## **Memorandum of Points and Authorities**

### **V. Introduction**

On June 11, 2018 Joe filed his notice of appeal contesting this court's decision denying his motion to reconsider. However, an order denying a motion to reconsider is not substantively appealable. The challenged decision stemmed from an evidentiary hearing held on June 13 & 14, 2017 concerning the validity of the parties' prenuptial agreement. No order was ever reduced to writing or entered by this court memorializing this court's decision before Joe's motion was filed. On September 7, 2018, this court entered its order and notice of entry of the order from the June 13 & 14, 2017 evidentiary hearing.

On September 13, 2018, the Nevada Supreme Court entered an order to show cause why the pending appeal on the decision concerning the prenuptial agreement should not be dismissed. In its order, the Court stated that "our preliminary review of the docketing statement and the documents submitted to this court pursuant to NRAP 3(g) reveal...[that] it appears that the judgment or order designated in the notice of appeal is not substantively appealable." The Court refers to the initial notice of appeal referencing this court's denial of Joe's motion to reconsider.

That defect was cured when, on September 10, 2018 Joe filed an amended notice of appeal referencing this court's order and notice of entry of order filed September 7, 2018. However, an additional procedural defect may exist: the order entered September 7, 2018 may be considered an interlocutory order depriving the Court of jurisdiction to consider Joe's appeal. As such, Joe now requests that this court certify that judgment as final pursuant to NRCP 54(b).



1           **VI. Summary of facts and procedural history**

2           On September 26, 2016 Plaintiff filed her complaint for divorce. On  
3           October 16, 2016, Joe filed his answer and counter-claim. In his counter-  
4           claim, Joe alleged that the prenuptial agreement the parties entered into in  
5           Georgia prior to their marriage should be enforced. Paragraph 9 of Joe's  
6           counterclaim stated:

7           *Defendant and Plaintiff entered into a Prenuptial Agreement*  
8           *("Agreement") prior to their marriage on August 13, 2008; that*  
9           *said Agreement complies fully with the requirements of NRS*  
10          *123A and is valid and enforceable Agreement in all respects. A*  
11          *copy of said Agreement is attached hereto as Exhibit "A". The*  
12          *Court shall confirm the terms of the parties' Agreement.*

13          On October 28, 2016, Plaintiff filed her reply to Joe's answer and  
14          counterclaim. There, Plaintiff denied paragraph 9, referenced above. On  
15          January 5, 2017, Plaintiff filed her motion entitled "Plaintiff's notice of  
16          motion and motion to invalidate the prenuptial agreement, for a business  
17          valuation, for spousal support arrears, and for attorney's fees and costs."

18          In that motion, Plaintiff alleged that "The Parties' Prenuptial  
19          Agreement is Invalid Under Georgia Law and Does Not Satisfy the Scherer  
20          Test." On February 9, 2017, Joe filed his opposition to Plaintiff's motion.  
21          On June 13 & 14, 2017, an evidentiary hearing on the issue of the parties'  
22          prenuptial agreement. At the conclusion of that evidentiary hearing, this  
23          upheld the prenuptial agreement in part, but invalidated key portions of the  
24          agreement, namely that certain assets acquired after the marriage were  
25          community property, despite provisions of the agreement that dictate a  
26          different result. To reach that decision, this court took evidence, primarily in  
27          the form of live testimony from various witnesses, that revealed events  
28          which occurred prior to the parties' marriage.





1 On April 24, 2018, Joe filed his motion requesting that this court  
2 reconsider its decision regarding the prenuptial agreement. On May 29,  
3 2018, that motion was denied. On July 10, 2018, this court vacated the trial  
4 on financial matters then pending in light of Joe's notice of appeal, filed  
5 June 11, 2018. On September 7, 2018, this court entered its order and notice  
6 of entry of order from the June 13 & 14, 2017 evidentiary hearing on the  
7 validity of the parties' prenuptial agreement. This motion follows.

8 **VII. Discussion**

9 **a. This court should certify its order entered September 4,**  
10 **2017 as final pursuant to NRCP 54(b)**

11 **i. Governing law – NRCP 54(b)**

12 NRCP 54(b) provides that a judgment or order of the district court  
13 which completely removes a party or a claim from a pending action may be  
14 certified as final "only upon an express determination that there is no just  
15 reason for delay...."<sup>1</sup> Thus, the rule clearly contemplates certification of a  
16 judgment resolving a claim.<sup>2</sup>

17 **ii. The district court may certify a judgment as final**  
18 **under NRCP 54(b) where claims for relief are not**  
19 **closely related**

20 This court may certify a judgment as final where there is no just  
21 reason for delaying such certification. If there is just reason for the delay,  
22 then certification is inappropriate: there can be no finding that there is no  
23 just reason for delay if the claims asserted in an action, albeit separate, are so  
24 closely related that the Nevada Supreme Court must necessarily decide  
25 important issues pending in the district court in order to decide the issues

26  
27 <sup>1</sup> *Hallicrafters Co. v. Moore*, 102 Nev. 526, 728 P.2d 441, 442 (Nev., 1986).

28 <sup>2</sup> *Mallin v. Farmers Ins. Exchange*, 106 Nev. 606, 797 P.2d 978, 981 (Nev., 1990).



1 appealed. In such a case, certification of an order deciding some but not all  
2 of those claims as final is an abuse of the district court's discretion.<sup>3</sup>

3 The analysis depends on defining when claims for relief are “closely  
4 related.” Concisely stated, where claims require proof of facts and elements  
5 not necessary to the proof of other claims, the claims for relief are not  
6 closely related;<sup>4</sup> claims for relief are closely related where it would  
7 necessarily decide the law of the case on any claims still pending in the  
8 district court.<sup>5</sup> In either case, consideration of an appeal would result in  
9 “piecmeal litigation” rendering certification of a judgment as final  
10 inappropriate.<sup>6</sup>

11 **iii. Joe’s claim that the parties’ prenuptial agreement is**  
12 **valid is not closely related to other claims for relief in**  
13 **the parties’ divorce action**

14 Here, the parties made various claims for relief arising from a single  
15 transaction: their marriage. The claims for relief included claims related to  
16 custody of the minor child at issue, the division of assets and debts, and  
17 related relief typical of any divorce proceeding. Not typical of most  
18 divorces, one of Joe’s claims for relief was that this court validate the  
19 parties’ prenuptial agreement. The claim related to the prenuptial agreement  
20 is not closely related to claims for relief concerning custody, assets, and  
21 debts.

22 First, the elements of Joe’s cause of action concerning the parties’  
23 prenuptial agreement are distinct from a determination of custody, which, at

24 <sup>3</sup> *Hallicrafters Co. v. Moore*, 102 Nev. 526, 728 P.2d 441, 443 (Nev., 1986);  
25 citing *Mid-Century Ins. Co. v. Cherubini*, 95 Nev. 293, 593 P.2d 1068  
26 (1979); *Las Vegas Hacienda v. G.L.M.M. Corp.*, 93 Nev. 177, 561 P.2d  
1334 (1977).

27 <sup>4</sup> *Id.* at 442.

28 <sup>5</sup> *Id.*

<sup>6</sup> *Id.*





1 its foundation, requires consideration of a child's best interests, and the  
2 division of assets and debts, which are considered community property  
3 absent compelling circumstances. Indeed, here, the elements of Joe's cause  
4 of action related to the prenuptial agreement depend on a consideration of  
5 Georgia law. Specifically, whether: 1) execution of the prenuptial agreement  
6 was not the result of fraud, duress, mistake, misrepresentation, or  
7 nondisclosure of material facts; 2) the agreement is not substantively  
8 unconscionable; and 3) considering the totality of the circumstances existing  
9 at the time of the execution of the prenuptial agreement, enforcement of that  
10 agreement would not be unfair. Thus, the claims for relief are distinct.

11 Second, the facts necessary to determine whether the elements of the  
12 cause of action concerning the validation of the prenuptial agreement are  
13 satisfied are markedly different from all other causes of action. The elements  
14 of the claim enunciated above require a consideration of facts and  
15 circumstances existing prior to the parties' marriage while the other claims  
16 for relief, including the division of assets and debts, and custody of the  
17 minor children, indeed all other claims for relief, depend on facts and  
18 circumstances existing or arising after the marriage. **Thus, the claims for**  
19 **relief in this matter are not closely related.**

20 Furthermore, there are no pending claims for relief by other parties  
21 still pending in the district court. Therefore, there is no danger that  
22 consideration of Joe's appeal would trigger the law of the case doctrine,  
23 rendering other claims still pending in the district court uncertain. In other  
24 words, there is no way that certification of the challenged order as final  
25 would result in parallel litigation at the district court and the appellate court  
26 by multiple parties on closely related claims. As such, this court should  
27 certify the judgment as final.  
28



1                   **b. A stay pending appeal is appropriate in this matter**

2                   Under N.R.C.P. 62(d), proceedings to enforce a judgment may be  
3 stayed in this court by giving a supersedeas bond. The test applied in  
4 considering whether to grant a stay were set forth in *Fritz Hansen*, and is  
5 reiterated in NRAP 8(c):

- 6                   • *Whether the object of the appeal/writ petition will be defeated if*  
7                   *the stay is denied;*  
8                   • *Whether appellant/petitioner will suffer irreparable or serious*  
9                   *injury if the stay is denied;*  
10                  • *Whether respondent/real party in interest will suffer irreparable*  
11                  *or serious injury if the stay is granted; and*  
12                  • *Whether appellant/petitioner is likely to prevail on the merits.*

13                  *Fritz Hansen A/S v. Dist. Ct.*, 116 Nev. 650, 6 P.3d 982 (2000); see also,  
14 e.g., *Wiese v. Granata*, 110 Nev. 1410, 887 P.2d 744 (1994); *State ex rel.*  
15 *Pub. Serv. Comm'n v. First Judicial Dist. Court ex rel. Carson City*, 94 Nev.  
16 42, 574 P.2d 272 (1978). Additionally, when confronted with a motion to  
17 reduce the bond amount or for alternate security, the district court should  
18 apply the factors considered by the 7<sup>th</sup> Circuit Court of Appeals, as  
19 delineated in *Dillon v. City of Chicago*, and adopted in *Nelson v. Heer*.<sup>7</sup>

20                  The purpose of security for a stay pending appeal is to protect the  
21 judgment creditor's ability to collect the judgment if it is affirmed by  
22 preserving the status quo and preventing prejudice to the creditor arising  
23 from the stay.<sup>8</sup> However, a supersedeas bond should not be the judgment  
24 debtor's sole remedy, particularly where other appropriate, reliable  
25 alternatives exist. **Thus, the focus is properly on what security will**

26  
27  
28 <sup>7</sup> *Nelson v. Heer*, 121 Nev. 832 (2005).

<sup>8</sup> *Id.*





**maintain the status quo and protect the judgment creditor pending an appeal, to include waiving the bond entirely.**

In reflecting on the purposes of security for a stay, the Seventh Circuit, in *Dillon v. City of Chicago*, set forth five factors to consider in determining when a full supersedeas bond may be waived and/or alternate security substituted:

- *the complexity of the collection process;*
- *the amount of time required to obtain a judgment after it is affirmed on appeal;*<sup>9</sup>
- *the degree of confidence that the district court has in the availability of funds to pay the judgment;*
- *whether the defendant's ability to pay the judgment is so plain that the cost of a bond would be a waste of money; and*
- *whether the defendant is in such a precarious financial situation that the requirement to post a bond would place other creditors of the defendant in an insecure position.*

**i. Discussion concerning the *Fritz Hansen* test**

**1. The Object of the Appeal**

This factor addresses whether an appeal would be rendered moot if an order appealed from was allowed to go into effect. The question is whether enforcing the judgment appealed from would destroy the subject matter of the appeal. A stark example in a divorce matter would be the division and sale of a separate property home as community property – obviously failing to stay a judgment compelling that result would destroy and defeat the purpose of the appeal: i.e., keeping the separate property home. Put another

---

<sup>9</sup> In considering the second factor, the district court should take into account the length of time that the case is likely to remain on appeal. See, *Nelson v. Heer*, 121 Nev. 832 (2005).



1 way, the question is whether a stay is necessary to preserve the issue on  
2 appeal: specifically, whether the “object of the appeal” is imperiled by  
3 enforcement of the underlying order, or the appeal would be rendered moot  
4 by such enforcement.

5 Here, as stated above, the purpose of the claim was to validate a  
6 prenuptial agreement that preserved assets acquired after marriage as Joe’s  
7 sole and separate property, pursuant to the terms of the prenuptial  
8 agreement. If the district court proceedings are not stayed and a judgment is  
9 entered dividing that property, or any proceedings from its sale or  
10 dissolution, then the object of the appeal would be destroyed.

## 11 **2. “Irreparable Harm” – Appellant**

12 In *Hansen*, the Court explicitly held that litigation expenses “are  
13 neither irreparable nor serious.” The question, necessarily, is whether any  
14 harm befalling Appellants is so irreparable that reversal on appeal would not  
15 ameliorate it. Here, again, the harm is the loss of a business and/or the  
16 proceeds from its operation or sale and all the good will attached to it. That  
17 is irreparable harm.

## 18 **3. “Irreparable Harm” – Respondent**

19 Though, in a theoretical sense, the relative interests of the parties are  
20 equal when the issue is strictly monetary, money may not always be a zero-  
21 sum game. Where the parties’ situations are vastly different, even money  
22 changing hands could have vastly different impacts on the parties’ relative  
23 welfare during the pendency of an appeal – an inconvenience to one could  
24 be a matter of life and death to the other. In this case, Joe is supporting  
25 Plaintiff through periodic payments in temporary alimony. Therefore,  
26 staying the proceedings pending appeal will not unduly prejudice Plaintiff.  
27  
28





#### 4. Likelihood of Prevailing

The Nevada Supreme Court held in *Hansen* that when moving for a stay pending an appeal or writ proceeding, a movant must “present a substantial case on the merits when a serious legal question is involved and show that the balance of equities weighs heavily in favor of granting the stay.” Here, there is a high likelihood of success on the merits. In previous hearings on Joe’s motion to reconsider the challenged decision, this court noted that it may have ruled otherwise if it had the briefing undersigned counsel provided concerning the issue. The court noted that there are issues ripe for appeal. Given this court’s misunderstanding of Georgia law, the likelihood that errors of law were made, as pointed out in great detail in Joe’s motion to reconsider, is great. Thus, the likelihood of prevailing on appealable is equally great.

#### VIII. Conclusion

For the foregoing reasons, Joe requests this court grant him the relief requested in its entirety.

DATED this September 17<sup>th</sup>, 2018.

/s/ Alex Ghibaudo

ALEX B. GHIBAUDO, Nevada Bar No. 10592

**ALEX B. GHIBAUDO, PC**

703 S. 8<sup>th</sup> Street

*Attorney for Defendant*



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 17<sup>th</sup> day of September, 2018, I served a true and correct copy of the foregoing **MOTION**, via the Court designated electronic service, addressed to the following:

John Blackmon

*jblackmon@blackmonlawgroup.com*

/s/ Joslyne Simmons

An Employee of ALEX B. GHIBAUDO, P.C.

MOFI

DISTRICT COURT  
FAMILY DIVISION  
CLARK COUNTY, NEVADA

Patricia Epsi  
Plaintiff/Petitioner

v. Yoav Epsi  
Defendant/Respondent

Case No. D-16-54074-D

Dept. Q

**MOTION/OPPOSITION  
FEE INFORMATION SHEET**

**Notice:** Motions and Oppositions filed after entry of a final order issued pursuant to NRS 125, 125B or 125C are subject to the reopen filing fee of \$25, unless specifically excluded by NRS 19.0312. Additionally, Motions and Oppositions filed in cases initiated by joint petition may be subject to an additional filing fee of \$129 or \$57 in accordance with Senate Bill 388 of the 2015 Legislative Session.

**Step 1.** Select either the \$25 or \$0 filing fee in the box below.

- ☐ **\$25** The Motion/Opposition being filed with this form is subject to the \$25 reopen fee.  
-OR-  
☒ **\$0** The Motion/Opposition being filed with this form is not subject to the \$25 reopen fee because:
- ☐ The Motion/Opposition is being filed before a Divorce/Custody Decree has been entered.
  - ☒ The Motion/Opposition is being filed solely to adjust the amount of child support established in a final order.
  - ☐ The Motion/Opposition is for reconsideration or for a new trial, and is being filed within 10 days after a final judgment or decree was entered. The final order was entered on \_\_\_\_\_.
  - ☐ Other Excluded Motion (must specify) \_\_\_\_\_.

**Step 2.** Select the \$0, \$129 or \$57 filing fee in the box below.

- ☒ **\$0** The Motion/Opposition being filed with this form is not subject to the \$129 or the \$57 fee because:
- ☒ The Motion/Opposition is being filed in a case that was not initiated by joint petition.
  - ☐ The party filing the Motion/Opposition previously paid a fee of \$129 or \$57.
- OR-  
☐ **\$129** The Motion being filed with this form is subject to the \$129 fee because it is a motion to modify, adjust or enforce a final order.
- OR-  
☐ **\$57** The Motion/Opposition being filing with this form is subject to the \$57 fee because it is an opposition to a motion to modify, adjust or enforce a final order, or it is a motion and the opposing party has already paid a fee of \$129.

**Step 3.** Add the filing fees from Step 1 and Step 2.

The total filing fee for the motion/opposition I am filing with this form is:

☒ **\$0** ☐ **\$25** ☐ **\$57** ☐ **\$82** ☐ **\$129** ☐ **\$154**

Party filing Motion/Opposition: Yoav Epsi Date 9/18/18

Signature of Party or Preparer

