IN THE SUPREME COURT OF THE STATE OF NEVADA

STEPHANIE RUBIDOUX,	)	
	)	
Appellant,	)	
vs.	)	Supreme Court No. 83628
	)	District Court No. D-20-601936-D
DANIEL RUBIDOUX,	)	
	)	
Respondent.	)	
	)	

AMENDED CHILD CUSTODY FAST TRACK RESPONSE

1. Name of party filing this fast-track response: Respondent, Daniel Rubidoux (Dan).

2. Name, law firm, address, and telephone number of attorney submitting this fast track response: Brian E. Blackham, Esq., GHANDI DEETER BLACKHAM, 725 S. Eighth Street, Suite 100, Las Vegas Nevada, 89101 (702) 878-1115.

3. Procedural history. Briefly describe the procedural history of the case only if dissatisfied with the history set forth in the fast track statement: Dan addresses disputed matters contained in Appellant Stephanie Rubidoux's (Stephanie) "Procedural History/Statement of Facts" below.

4. Statement of facts. Briefly set forth the facts material to the issues on appeal only if dissatisfied with the statement set forth in the fast track statement

(provide citations for every assertion of fact to the appendix, if any, or to the rough draft transcript):

Appellant Stephanie Rubidoux (Stephanie) and Respondent Daniel Rubidoux (Dan) were married on June 21, 2014 and have one minor child, to wit: Riley Rubidoux (Riley), born January 13, 2016, presently six (6) years old.

Based on the Partial Parenting Agreement, the parties agreed to share joint legal custody of Riley and alternate holidays. *RA0020-RA0025*. However, Stephanie requested an award of primary physical custody, while Dan sought an award of joint physical custody. *RA0001-0014.* Stephanie premised her request for primary physical custody on allegations of prior domestic violence between the parties. *RA0031-0048.* At the Case Management Conference and Return from Mediation held on April 16, 2020, although the district court did not make a custodial designation as Stephanie claims in her statement, it awarded Dan joint physical custody of Riley from Friday at 6:00 p.m., to Sunday at 6:00 p.m., in week one, and from Friday at 6:00 p.m., until Monday at 6:00 p.m., in week two. *RA0015-RA0018*. This temporary schedule was maintained following the June 16, 2020 status check hearing, where the court also set the matter for trial. *RA0026-RA0030.* The trial proceeded for two full days on May 14, 2021, and June 25, 2021.

On September 16, 2021, the district court entered its Findings of Fact, Conclusions of Law, and Decree of Divorce (FFCL). *RA0671-RA0673.* Following a

detailed analysis of the requisite factors in NRS 125C.0035, the district court found that it was in Riley's best interests for the parties to share joint physical custody. *RA0686.* Most significant to the present appeal, while finding that Stephanie proved a single incident of domestic violence by clear and convincing evidence—which occurred on January 20, 2019—in weighing the factors set forth in NRS 125C.0035, the district court concluded that Dan rebutted the presumption that sole or joint physical custody of the child to him was not in the best interest of the child, and ultimately awarded the parties joint physical custody. *RA0685; RA0684-RA0686; RA0695*.

Given the limited scope of this appeal, Dan objects to Stephanie's irrelevant and slanted recitation of the record, particularly as to the allegations of violence beyond the January 2019 incident. Significantly, Stephanie has not alleged in this appeal that the district court abused its discretion in not finding by clear and convincing evidence that additional acts of domestic violence occurred, only that Dan failed to rebut the statutory presumption as to the January 2019 incident. As such, while Dan disputes Stephanie's characterization of that incident and other alleged incidents in her fast track statement, because these alleged incidents were unproven and entirely irrelevant to the issues now before the Court, in the interests of pertinence and brevity, Dan declines to address them here.

Issues on appeal. State concisely your response to the principal issue(s) in this appeal:

A. Did the District Court abuse its discretion by failing to make specific findings of fact justifying its belief that Daniel overcame the presumption against joint or primary physical custody after the District Court found by clear and convincing evidence that acts of domestic violence in fact occurred? The district court found that Stephanie had proven a single act of domestic violence on the part of Dan by the requisite clear and convincing evidence standard.[1] *RA0685*. However, the district court found that Dan rebutted the presumption under NRS 125C.0035(5) because he had been able to successfully parent Riley over the intervening 14 months, without incident and with the parties mostly working together, as further set forth in the district court's analysis of the relevant best interest factors. *Id.* As such, the district court clearly did not abuse its discretion, as it made specific findings of fact in support of its conclusion that Dan overcame the rebuttable presumption created under NRS 125C.0035(5).

B. Did the District Court abuse its discretion when it failed to make

[1] It is important to note that the court made *no* findings that Dan committed any act of domestic violence against Riley, nor did Stephanie ever make such an allegation at trial. Further, the criminal case against Dan resulting from the January 2019 altercation was dismissed following Dan's satisfying all requisite conditions, including completion of Domestic Violence Counseling. RA0710; RA00335-RA00336.

specific findings or orders that would protect the child or victim of abuse (Stephanie) from further acts of domestic violence? In its FFCL, the district court specifically noted that it can "craft a custodial schedule and exchange protocol (contained in the orders below) that minimizes the parties' contact with each other and the chances of further inappropriate verbal arguments or physical altercations, thereby protecting Stephanie and Riley." *RA0685-RA0686.* As such, the district court clearly did not abuse its discretion in failing to make specific findings or orders that would protect the child or victim of abuse (Stephanie) from further acts of domestic violence.

C. Did Daniel rebut the presumption that arose prohibiting him from an award of either joint or primary physical custody? The simple answer is, yes. The trial court made numerous findings in support of its conclusion that Dan rebutted the presumption against an award of joint or primary physical custody. Specifically, the district court found that Dan rebutted the presumption under NRS 125C.0035(5), as further described below.

5. Legal argument, including authorities:

A. LEGAL STANDARD

"This [C]ourt reviews the trial court's decisions regarding child custody and visitation for an abuse of discretion." *Rivero v. Rivero,* 125 Nev 410, 428, 216 P.3d 213, 226 (2009). "An abuse of discretion occurs if the district court's decision is arbitrary or capricious or if it exceeds the bounds of law or reason." *Skender v.*

Brunsonbuilt Constr. & Dev. Co., 122 Nev. 1430, 1435, 148 P.3d. 710, 714 (2006). The district court's findings must be supported by substantial evidence. *Id.* Substantial evidence is evidence that a reasonable person may accept as adequate to support the judgment.

B. THE TRIAL COURT DID NOT ABUSE ITS DISCRETION BECAUSE IT MADE SPECIFIC FINDINGS OF FACT JUSTIFYING ITS BELIEF THAT DANIEL OVERCAME THE PRESUMPTION AGAINST JOINT OR PRIMARY PHYSICAL CUSODY AFTER FINDING BY CLEAR AND CONVINCING EVIDENCE THAT AN ACT OF DOMESTIC VIOLENCE IN FACT OCCURRED.

The Nevada Legislature has declared it to be the policy of this state to "ensure that minor children have frequent associations and a continuing relationship with both parents" after divorce and to "encourage such parents to share the rights and responsibilities of child rearing[.]" NRS 125C.001. Further, NRS 125C.0025(b) states that there is a preference that joint physical custody would be in the best interest of a minor child if: "[a] parent has demonstrated, or has attempted to demonstrate but has had his or her efforts frustrated by the other parent, an intent to establish a meaningful relationship with the minor child."

The district court has "broad discretionary power" in determining child custody, including visitation. *Davis v. Ewalefo*, 131 Nev. 445, 450, 352 P.3d 1139, 1142, (2015) (citing *Hayes v. Gallacher,* 115 Nev. 1, 4, 972 P.2d 1138, 1140 (1999); NRS 125A.045; *Wallace v. Wallace,* 112 Nev. 1015, 1019, 922 P.2d 541, 543 (1996)). In

Davis, this Court stressed that a child custody decree or order must be tied to the child's best interest, as informed by specific, relevant findings respecting the NRS 125.480(4)[2] and any other relevant factors, to the custody determination made. *Id.* at 451, 1143.

Stephanie argues that the district court order "simply restates the parties' testimony without making findings, or sets forth factual findings without discussion of the associated best interests factors as they relate to the custody order". *See Petitioner's Child Custody Fast Track Statement at pages 17-18*. To say that Stephanie's reliance on *Davis* in support of her position is misplaced would be an understatement. There, the district court awarded the child's mother primary physical custody, with unsupervised visitation to the father, who resided and worked in Africa. *Davis*, 131 Nev. at 449, 362 P.3d at 1152. The trial court further ordered that visitation could not occur in Africa, and that the child was prohibited from travelling outside the country absent further order of the district court or written agreement of the parties. *Id*. This Court reversed and remanded the order because the trial court failed to provide any factual basis, or specific findings connecting the child's best interests, for denying the father's request for the child's visitation in Africa or the ban on international travel. *Id*. The *Davis* Court noted specifically that the trial court failed to explain or make particularized findings as to why the

[2] Now NRS 125C.0035(4).

international travel and visitation restrictions imposed were in the best interest of the child, E.D. *Id.* at 449-50, 1152. The *Davis* Court further noted:

> Orally, the district judge stated, "We know that the law attempts to maximize the relationship between the child and both parents," *see* NRS 125.460, then said it would "hit" the "NRS 125.480 factors," even though "a lot of them are not particularly applicable." The court found E.D., then almost seven, too young to have a creditable visitation preference; that Davis's and Ewalefo's conflicts were "minimal"; that neither Davis nor Ewalefo suffers mental or physical health problems; that E.D. is "normal, healthy [and] active"; that E.D. had traveled with his parents—to Africa, in fact—and "benefitted from ... that travel"; that although E.D. has spent more time with his mother than his father, nothing suggests "that [E.D.'s] relationship with [his father] is anything other than a healthy, normal relationship"; that as for "Any history of parental abuse or neglect of the child, there's no evidence of any abuse or neglect"; and that there is "no evidence ... of domestic violence," and "no evidence of a parental abduction" in this case. The court's only arguably negative finding as to either parent was that Ewalefo "has demonstrated a tendency towards controlling behavior," though it added "that may simply [be] because of the absence of [court] orders and being the primary parent stepping up[.]" *Id.*

As for Africa, specifically Uganda and Rwanda, the district court made only these cryptic findings: "In terms of the visitation in Africa ... I should note that the world is a dangerous place as we've learned even in the United States terrorism can occur, that *the proposed countries [for visitation in Africa–Rwanda and Uganda] are not Hague signatories nor Hague compliant.*" *Id.* at 450, 1142. (Emphasis added by *Davis* Court). The district court did not offer any findings to justify its larger prohibition on international travel for E.D. *Id.*

The present FFCL bears no resemblance to the threadbare and conclusory order in *Davis*. Here, the district court not only made its specific factual findings based on the substantial testimony and evidence presented at the time of trial, but it tied those findings directly to the minor child Riley's best interests. For example, in analyzing NRS 125C.0035(4)(c), which parent is more likely to allow the child to have frequent associations and a continuing relationship with the noncustodial parent, the district court found and concluded as follows:

> The Court concludes this factor favors Dan. The Court has serious concerns with Stephanie's ability to support Dan's relationship with Riley. Specifically, prior to the April 16, 2020 hearing in this matter, where the Court awarded visitation to Dan, Stephanie refused to allow Dan any visitation with Riley from March 15, 2020 until the Court ordered the same at the hearing. Likewise, Stephanie withheld Dan's visitation during Christmas, which was a violation of the Court's order. These actions demonstrate Stephanie's unwillingness to foster Riley's relationship with Dan. *RA0681*.

Likewise, in analyzing NRS 125C0035(4)(e), the ability of the parents to cooperate to meet the needs of the child, the district court found and concluded as follows:

> Stephanie's attitude in all respects is that she is superior to Dan as a parent, that his wishes and ideas should not be considered, and that it is "her way or the highway." Such attitudes demonstrate that Stephanie has impeded the parties' ability to cooperate to meets Riley's need. The testimony and evidence did not show that Stephanie is a superior parent and in fact, both parents have shortcomings. However, the Court's concerns as to this factor are moderated by the temporary visitation schedule, wherein Dan had custody of Riley 35.7% of the time. The parties abided by this schedule over the past fourteen months, most of which occurred without issue and

> with the parties working together. Thus, the Court concludes this factor is neutral. *RA0682*.

Additionally, in analyzing NRS 125C.0035(4)(g), the physical, developmental and emotional needs of the child, the district court found and concluded as follows:

> Riley has multiple needs that do not favor either parent having primary physical custody. Riley is five years old and needs to feel safe and secure. While residing together, the parties did not provide Riley with safety and security due to their constant fighting, and the chaos, and drama in the home. Now that the parties have separated, Riley is safer, more secure, and happy because there is no longer ongoing chaos in the parties' relationship. The Court concludes this factor is neutral. *RA0683*.

As shown by the examples quoted above, the district court rendered specific findings of fact as to the requisite findings as to the requisite best interest factors *and* clearly tied those findings to the child's best interest as a whole.

Concerning the rebuttable presumption invoked by NRS 125C.0035(5), the district court found:

> Dan has rebutted the presumption under NRS125C.0035(5) because he has been able to parent Riley over the past 14 months, and he has demonstrated that Stephanie did not appear afraid in any of the alleged domestic violence incidents, but in fact, antagonized him by calling him things such as an "oversensitive bitch." Both parties have engaged in inappropriate behavior, but in the January 2019 incident, Dan's actions rose to the level of domestic violence. *RA0685.*

Stephanie inexplicably argues that the above finding is conclusory and bereft of factual support. But the factual support is brimming both there and in the district court's comprehensive best interest analysis, as quoted earlier. For example, in its

analysis of NRS 125C.0035(4)(e) the district court found that the parties had followed the temporary custodial timeshare for 14 months mostly without incident, and with the parties working together, and alluded to these earlier findings in its rebuttal finding, above.[3] Nothing in the FFCL remotely resembles the detached and grossly inadequate findings—e.g., "the world is a dangerous place"—at issue in *Davis*. Here, the district court clearly made sufficient findings of fact to support its award of joint physical custody to the parties. *RA0695*.

Finally, Stephanie's claim that the district court made contradictory findings that cannot be reconciled is simply not true. The findings that Stephanie complains of are discussed below:

> There is one act of domestic violence that Stephanie proved by clear and convincing evidence, and that is the incident that occurred in January 2019. The Court concludes this incident was clearly domestic violence on the part of Dan, as he put his hands on Stephanie, and it does not matter what Stephanie said to antagonize the incident. *RA0685*.

And later, as to the rebuttable presumption, the district court found:

> Stephanie did not appear afraid in any of the alleged domestic violence incidents, but in fact, antagonized him by calling him things such as an "oversensitive bitch." *RA0685*.

There is nothing contradictory about these findings. In the first, the district court understandably concluded that verbal antagonism does not excuse a physical

[3] It is also noteworthy that Stephanie presented no evidence of any physical injury resulting from the January 2019 incident.

response. The second statement that "Stephanie did not appear afraid" is nevertheless relevant to the court's determination that Dan rebutted the presumption against joint physical custody, as Stephanie did not seem to be afraid of Dan and subjectively ascertained no serious risk to her safety posed by Dan. This does not excuse the action that led to the court's domestic violence finding, but it does not have to. The two provisions serve two distinct purposes.

Given the above, the district court clearly did not abuse its discretion in finding that Dan overcame the rebuttable presumption against an award of joint or primary physical custody, and the FFCL should be affirmed.

C. THE TRIAL COURT DID NOT ABUSE ITS DISCRETION BECAUSE IT MADE SPECIFIC FINDINGS AND ORDERS THAT PROTECT THE CHILD AND/OR VICTIM OF ABUSE (STEPHANIE) FROM FURTHER ACTS OF DOMESTIC VIOLENCE.

NRS125C.0035(5) states that an applicable finding of domestic violence by a parent though clear and convincing evidence "creates a rebuttable presumption that sole or joint physical custody of the child by the perpetrator of the domestic violence is not in the best interest of the child." That section further states that in making such a determination, the district court must set forth:

> (a) Findings of fact that support the determination that one or more acts of domestic violence occurred; and
> (b) Findings that the custody or visitation arrangement ordered by the court adequately protects the child and the parent or other victim of domestic violence who resided with the child.

In that regard, the district court's FFCL states the following:

> Both parties have engaged in inappropriate behavior, but in the January 2019 incident, Dan's actions rose to the level of domestic violence. Despite this, and because Dan rebutted the presumption that sole or joint physical custody of the child by the perpetrator of domestic violence is not in the best interest of the child, **the Court can craft a custodial timeshare and exchange protocol (contained in the orders below) that minimizes the parties' contact with each other and the chances of further inappropriate verbal arguments or physical altercations, thereby protecting Stephanie and Riley.** (Emphasis supplied) *RA0685-RA0686*.

Thus, the district court fulfilled the requirement of NRS 125C.0035(5)(a) by clearly identifying that an act of domestic violence occurred in January 2019, with Dan being the perpetrator, and NRS 125C.0035(5)(b) by clearly identifying that the custodial timeshare ordered by the district court would protect Riley and Stephanie—it is important to reiterate that Dan was never alleged to have committed domestic violence against Riley—by **minimizing the parties' contact with each other**, thus, mitigating the likelihood of a further act of domestic violence (Emphasis supplied). The district court clearly identified its finding that the custodial order and corresponding exchange protocol was specifically designed to minimize the parties' contact with each other by ensuring that the exchanges took place at the child's school, i.e., without the parties having to see each other or, in the event there is no

school, in accordance with the text and seatbelt rule.[4] Thus, Stephanie's allegation that the trial court failed to make findings that the custody arrangement ordered by the court adequately protects Riley and Stephanie is without merit.

Accordingly, the trial court did not abuse its discretion because it made specific findings and orders that protect the child or victim of abuse (Stephanie) from further acts of domestic violence.

D. DANIEL REBUTTED THE PRESUMPTION THAT AROSE AND WAS PROPERLY AWARDED JOINT PHYSICAL CUSTODY.

At the outset, Dan reiterates that the scope of Stephanie's fast track statement as to domestic violence is limited to whether the district court properly found Dan rebutted the presumption against joint physical custody (and made sufficient findings concerning the same) invoked by NRS 125C.0035(5) related to the *January 2019 incident*; Stephanie is *not* arguing that the district court abused its discretion by not finding that other acts of domestic violence occurred. This is clear in Stephanie's framing of the questions presented to the Court and the primary focus of her argument. Nevertheless, Dan reiterates this point due both to the Stephanie's lengthy and slanted recitation of the factual history of the case, as well as her

[4] The district court defined the text and seatbelt rule as follows: "During custodial exchanges, the receiving parent shall remain in the parent's vehicle with the seatbelt fastened, the delivering parent shall remain in the doorway of the exchange location, and the child shall exit the delivering parent's residence on his own and join the receiving parent." *Id.*

apparent assertion here that the district court's decision not to find additional acts of domestic violence somehow not only invalidates its finding that Dan rebutted the presumption resulting from the one act of domestic violence that was found, but necessitates incorporating whole provisions of Californian statutory authority into Nevada's case law.

Stephanie accurately notes the scarcity of Nevada case law concerning what facts or factors may rebut a legal presumption against joint or primary physical custody; however, while constituting persuasive authority, this Court has provided guidance. In *Ayon v. Inboden*, 134 Nev. 953, 2018 WL 6311779, at 2 (2018), despite concluding that the district court's failure to find that the appellant mother committed an act of domestic violence was clearly erroneous, this Court nevertheless upheld the trial court's award of primary physical custody to the mother, stating:

> The record contains substantial evidence to rebut the presumption. The incident appeared to be an isolated incident wherein both parties may have acted inappropriately. The rest of the best interest factors weighed in Ayon's favor or were neutral, and the findings related to those factors were supported by substantial evidence in the record.[2] *Rivero*, 125 Nev. at 428, 216 P.3d at 226. Under these facts, we cannot conclude that the district court abused its discretion in awarding primary physical custody to Ayon. *See Saavedra-Sandoval v. Wal-Mart Stores, Inc.*, 126 Nev. 592, 599, 245 P.3d 1198, 1202 (2010) (affirming a correct result, though on grounds different from those relied on by the district court). *Id.*

The *Ayon* Court's affirmance of the district court's decision is especially notable because the opinion itself articulates specific facts rebutting a legal

presumption against the perpetrator of an act of domestic violence that the district court never found in accordance with NRS 125C.0035(5). *Id.* Moreover, the *Ayon* decision effectively acknowledges that analysis of the other statutory best interest factors is appropriate in determining whether a parent has rebutted the legal presumption against him or her. *Id.* This is precisely the analysis undertaken by the district court here, and to which Stephanie objects.

It is notable that other courts have likewise found that consideration of children's best interests as a whole is appropriate in determining whether a parent has rebutted a finding of domestic violence. *See e.g.*, *Nemec v. Goeman*, 810 N.W.2d 443, 448, 2012 S.D. 14, ¶ 22 (S.D.,2012) (finding that although the father had an assault conviction, the lower court carefully considered all of the factors relevant to determining the children's best interests, which overwhelmingly indicated that primary physical custody to the father was in the children's best interests).

Finally, Stephanie argues that this Court should adopt, as case law, provisions from the California Family Code section 3044 (and California case law interpreting these provisions) that she believes support her argument that the district court abused its discretion in finding that Dan overcame the rebuttable presumption in NRS 125C.0035(5). As shown below, this argument must also fail.

Article 3, Section 1 of the Nevada Constitution states, in pertinent part, as follows:

> Three separate departments; separation of powers; legislative review of administrative regulations.
>
> 1. The powers of the Government of the State of Nevada shall be divided into three separate departments,—the Legislative,—the Executive and the Judicial; and no persons charged with the exercise of powers properly belonging to one of these departments shall exercise any functions, appertaining to either of the others, except in the cases expressly directed or permitted in this constitution.
>
> …

Separation of powers "is probably the most important single principle of government declaring and guaranteeing the liberties of the people," and it works by preventing the accumulation of power in any one branch of government. *Heller v. Legislature of State of Nev.*, 120 Nev. 456, 466, 93 P.3d 746, 753 (2004) (quoting *Galloway v. Truesdell,* 83 Nev. 13, 18, 422 P.2d 237, 241 (1967)). *See also*, Galloway, 83 Nev. at 26-21, 244 P.2d at 242-43 distinguishing the powers among the three branches of government.

Here, Stephanie asks this Court to adopt substantive provisions of California Family Code section 3044 in place of the governing statute NRS 125C.0035(5). First and foremost, what Stephanie seeks would constitute an impermissible encroachment by the judicial branch on a coequal branch of government, effectively rewriting the governing statutory authority. Beyond identifying public policy

considerations that could be properly addressed as proposed amendments to NRS Chapter 125C, Stephanie cites to no authority entitling her to bypass the legislative process by virtue of the present fast track appeal. For this reason alone, Stephanie's request must be denied. Furthermore, as shown above, this Court has already opined in persuasive authority as to what facts would constitute good cause for a district court to find that the NRS 125C.0035(5) presumption has been rebutted, and such is consistent with the present case. *Ayon*, 2018 WL 6311779, at 2. As such, there is simply no need for Dan to address the substantive "adoptions" that Stephanie seeks from California's statutory code. The district court rendered specific findings of fact and conclusions of law demonstrating that Dan overcame the rebuttable presumption in NRS 125C.0035(5) and crafted a custodial timeshare and exchange protocol that adequately meets Riley's best interests, while protecting Riley and Stephanie from any perceived risk of domestic violence.

Accordingly, the district court's FFCL was proper and should be affirmed.

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E. Preservation of issues. State concisely your response to appellant's position concerning the preservation of issues on appeal:

This is not directly applicable to the present case. Dan requests leave to supplement this response should Stephanie seek to argue issues not preserved for appeal.

Dated this 28th day of January, 2022.

GHANDI DEETER BLACKHAM

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CERTIFICATE OF COMPLIANCE

1. I hereby certify that this fast track response 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: This fast track response has been prepared in a proportionally spaced typeface using Microsoft Office Word 2013, in fourteen (14) point Times New Roman font.

2. I further certify that this fast track response complies with the page-or type-volume limitations of NRAP 3C(h)(2) because it is proportionately spaced, has a typeface of 14 points or more and contains 4,758 words.

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3. Finally, I recognize that pursuant to NRAP 3C I am responsible for filing a timely fast track response and that the Supreme Court of Nevada may sanction an attorney for failing to file a timely fast track response, or failing to cooperate fully with appellate counsel during the course of an appeal. I therefore certify that the information provided in this fast track response is true and complete to the best of knowledge, information and belief.

Dated this 28th day of January, 2022.

GHANDI DEETER BLACKHAM

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CERTIFICATE OF SERVICE

The foregoing "Child Custody Fast Track Response" was served on January 28th, 2022 up Appellant through the Court's electronic service system to the following:

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Dated this 28th day of January, 2022.

An Employee of Ghandi Deeter Blackham