

No. 94989-1

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

In re the Marriage of

ANNE KARI BREWITT
Respondent

and

ISLAM GAMAL EL DIN MICHAEL ABDEL GHANI
Petitioner

ON REVIEW FROM THE SUPERIOR COURT OF THE
STATE OF WASHINGTON FOR KING COUNTY

RESPONDENT'S ANSWER TO PETITION FOR REVIEW

CALEB M. OKEN-BERG
SKELLENGER BENDER, P.S.
Attorneys for Respondent
1301 Fifth Avenue, Suite 3401
Seattle, WA 98101
(206) 623-6501

TABLE OF CONTENTS

A. IDENTITY OF RESPONDENT.....1

B. RESTATEMENT OF ISSUES ON WHICH REVIEW IS SOUGHT1

C. RESTATMENT OF THE CASE.....1

D. ARGUMENT WHY REVIEW SHOULD NOT BE GRANTED 12

 1. THE COURT PROPERLY FOUND THAT THE FATHER’S VIOLATIONS OF CONTACT PROVISIONS ALLOWED FOR THE ENTRY OF A PROTECTION ORDER, WHICH WAS IN THE CHILD’S BEST INTEREST.....12

 2. THE COURT OF APPEALS PROPERLY FOUND THAT THE AGREED CUSTODY ORDERS WERE UNAMBIGOUS AND WERE NOT MISREAD BY THE TRIAL COURT.....14

E. MOTION FOR ATTORNEY’S FEES 15

F. CONCLUSION..... 16

TABLE OF AUTHORITIES

Washington Cases

In re Marriage of Barone, 100 Wn.App. 241, 996 P.2d 654 (2000) 11

In re Marriage of Petrie, 105 Wn.App. 275, 19 P.3d 443 (2001)13,14

In re Marriage of Smith, 158 Wn. App. 248, 241 P.3d 449 (2010)..... 14

Burrill v. Burrill, 113 Wn. App. 863, 56 P.3d 993 (2002) 15

Statutes

RCW 26.27.041(3)5

RCW 26.09.191 7,13

RCW 26.09 12

Rules

CR 12(b)(1)5

RAP 13.4(b)12,16

A. IDENTITY OF RESPONDENT

The Respondent is Anne Kari Brewitt, who was the petitioner in the Superior Court and the respondent in the Court of Appeals.

B. RESTATEMENT OF ISSUES ON WHICH REVIEW IS SOUGHT

1. Did the court properly find that the father's violations of contact provisions allow for the entry of a Protection Order, which was in the child's best interest?
2. Were the agreed custody orders unambiguous and not misread by the trial court?
3. Should the mother receive her fees for answering Mr. Ghani's petition?

C. RESTATEMENT OF THE CASE

Ms. Brewitt and Mr. Abdel Ghani¹ met in August 2009, shortly after Ms. Brewitt moved to Alexandria, Egypt to work at the spa of the Four Seasons Hotel, where Mr. Abdel Ghani also was employed. CP 261. Ms. Brewitt was 24 years old at the time and Mr. Abdel Ghani was 33 years old. CP 361. According to Ms. Brewitt, the parties' relationship was tumultuous from early on, primarily due to Mr. Abdel Ghani's extreme and irrational jealousy of Ms. Brewitt, his stalking of Ms. Brewitt, his serious physical

¹ Ms. Brewitt is a U.S. citizen and Mr. Abdel Ghani is an Egyptian citizen.

and emotional abuse of her, and his attempts to control Ms. Brewitt's every move.² CP 239-244.

The parties were ultimately married in Alexandria, Egypt on June 10, 2013. CP 362. There is one child of this marriage, A.G., born April 23, 2014. CP 361. Mr. Abdel Ghani's domestic violence and control of Ms. Brewitt escalated after the birth of the child. CP 239. According to Ms. Brewitt, shortly after the child was born, Mr. Abdel Ghani grabbed Ms. Brewitt by the neck, pushed her against the wall, and threatened to kill her while their son was watching. *Id.* Ms. Brewitt indicates there were many other acts of domestic violence, including but not limited to the following examples: (1) Mr. Abdel Ghani routinely confined Ms. Brewitt and the child to the parties' apartment for 15 hours alone and he forbade Ms. Brewitt from leaving without his permission; (2) Mr. Abdel Ghani would control Ms. Brewitt's every move, from what television channels she could watch to the exact temperature of the air conditioner; (3) Mr. Abdel Ghani refused to allow Ms. Brewitt out on the apartment balcony, out of fear that someone might see her; (4) Mr. Abdel Ghani required Ms. Brewitt to sit for hours on end in their hot Egyptian apartment with no electricity; and (5) Mr. Abdel Ghani forced Ms. Brewitt to shower in the dark because he was fearful that

² A detailed background of facts can be found in Ms. Brewitt's Declaration in Response to Abdel Ghani's Motion to Dismiss. CP 260-299.

somehow she could be seen through the frosted bathroom window that opened into an interior airshaft of the building. CP 239-244, CP 260-299. Ms. Brewitt states that she lived in constant fear that Mr. Abdel Ghani would “catch” her disobeying him. *Id.* Ms. Brewitt claimed that if Mr. Abdel Ghani discovered that Ms. Brewitt had not followed his commands, he would punish her with rage-filled outbursts that included physically assaulting her, emotionally berating her, or threatening to cause serious harm to her. *Id.* Mr. Abdel Ghani expressed no remorse for his domestic violence and believed it was an acceptable way to treat his wife. CP 242.

In summer 2014, Mr. Abdel Ghani came home from work in a rage and attacked Ms. Brewitt while she sat on the couch with the baby, striking her twice across the face and body. CP 277. Ms. Brewitt reports that she attempted to protect the child with her body, but Mr. Abdel Ghani ended up striking Ms. Brewitt and the child. *Id.* In September 2014, Mr. Abdel Ghani became enraged after he broke into Ms. Brewitt’s cell phone and found a picture that she had sent to her mother and girlfriend in which she was modestly dressed, but not wearing a veil. CP 280. Mr. Abdel Ghani took the child’s passports into his possession and told Ms. Brewitt that she had three days to leave the country without the child. *Id.*; CP 318.

On September 15, 2014, Ms. Brewitt and the child were able to escape to the U.S. Embassy in Cairo and they were placed in a safe house

in protective custody of the U.S. government. CP 318. After Ms. Brewitt provided a sworn statement to the Embassy, the U.S. State Department issued a passport for the child based on the threats to Brewitt's life. *Id.* In a harrowing experience, the U.S. Embassy officials were able to extract Ms. Brewitt and A.G. out of Egypt to safety, even though Mr. Abdel Ghani had followed them to the airport in an attempt to block their exit. *Id.*; CP 243.

After returning to the United States, Ms. Brewitt and the child moved to Seattle and Ms. Brewitt filed for dissolution and a Domestic Violence Protection Order on October 7, 2014. CP 233-237. On October 8, 2014, the court issued a Temporary Domestic Violence Protection Order ("DVPO"), which awarded Ms. Brewitt temporary custody and control of A.G. CP 250-255. On November 18, 2014, Mr. Abdel Ghani obtained counsel on his behalf in the King County case. CP 318. After two months of negotiations, on January 13, 2015, Mr. Abdel Ghani agreed for his counsel to accept service of the dissolution pleadings on his behalf and Mr. Abdel Ghani consented to the personal jurisdiction in King County, Washington. CP 319.

On February 10, 2015, Mr. Abdel Ghani filed his Response to the Petition in King County. CP 319. Ms. Brewitt learned for the first time by way of the Response to the Petition that Mr. Abdel Ghani had unilaterally obtained a divorce in Egypt on January 17, 2015. CP 319-320. Ms. Brewitt

received no notice of the Egyptian divorce proceeding, nor was she given any opportunity to participate. CP 319. Mr. Abdel Ghani subsequently filed an appeal in Egypt (again with no notice to Ms. Brewitt), seeking to terminate any custody rights to Ms. Brewitt on the grounds that she was an apostate. *Id.*

Over four months after his attorney appeared in the case in King County, on March 23, 2015, Mr. Abdel Ghani filed a “CR 12(b)(1) motion to dismiss” the child custody action in King County. CP 317. Mr. Abdel Ghani argued in his motion that the court should dismiss the child custody action under the Uniform Child Custody Jurisdiction Enforcement Act (UCCJEA), but he included no expert affidavits or materials to support his position that Washington should enforce child custody orders issued by an Egyptian court applying Islamic/Sharia law. CP 320. In her response to Mr. Abdel Ghani’s motion, Ms. Brewitt also invoked the UCCJEA to request that the court deny Mr. Abdel Ghani’s motion pursuant to RCW 26.27.041(3). *Id.* In her opposition to Mr. Abdel Ghani’s motion, Ms. Brewitt provided expert declarations regarding the child custody laws of Egypt in order to show that the Egyptian laws violated fundamental principles of human rights. *Id.*

On June 9, 2015, the court issued a detailed order denying Mr. Abdel Ghani’s motion to dismiss. CP 317-325. The trial court determined there

was clear and convincing evidence that Egyptian child custody laws violate fundamental principles of human rights, and that the trial court in King County would not recognize Egypt as a “state” for the purposes of applying the UCCJEA. CP 322-323. The trial court also found that Mr. Abdel Ghani had “committed frequent and repeated acts of serious domestic violence against Petitioner” and that Washington had subject matter jurisdiction over the child.³ CP 318, 323-324. Mr. Abdel Ghani filed a motion for discretionary review of the trial court’s order denying his motion to dismiss in the Washington Court of Appeals for Division One. On November 10, 2015, the Court denied Mr. Abdel Ghani’s Motion for Discretionary Review. *See* Appendix A to Brief of Respondent filed under Court of Appeals Case No. 76279-6-I.

On September 1, 2015, Debra Hunter, M.A. (the court-appointed parenting evaluator) issued her report, which included recommendations that the child reside with Ms. Brewitt, that Ms. Brewitt have sole-decision making authority for the child, and that restrictions be placed on Mr. Abdel Ghani’s contact with the child based on a history of acts of domestic violence. CP 360-376. The parties attended a mediation on November 24, 2015, with counsel, at which they agreed to final orders in their marital

³ Mr. Abdel Ghani admitted in his declaration filed as part of this motion that he had hit Ms. Brewitt on at least one occasion. CP 313.

dissolution action. CP 35. Specifically, the parties agreed to maintain all the existing restraints against Mr. Abdel Ghani from the temporary restraining order, but those restraints were moved into the Decree of Dissolution. CP 35, CP 30-33. The parties also specifically agreed that Ms. Brewitt had the right to a permanent Domestic Violence Protection Order for herself and the child if Mr. Abdel Ghani violated any of the restraints set forth in the Decree. CP 33. The restraints against Mr. Abdel Ghani included a prohibition on Mr. Abdel Ghani contacting Ms. Brewitt or the minor child, except as expressly set forth in the Final Parenting Plan. CP 32. The parties' Final Parenting Plan incorporated the parenting evaluator's findings that there was a basis for restrictions and limitations on the Mr. Abdel Ghani's residential time under RCW 26.09.191 based on a history of domestic violence. CP 6, 375.

Under the terms of the parties' Final Parenting Plan, Mr. Abdel Ghani was permitted to have Skype visitation with the minor child once per week for 15 minutes. CP 7. The Final Parenting Plan specifically stated that the parties may have contact during the Skype visitation "only to the extent necessary to initiate and facilitate the Skype visitation. If either party needs to reschedule the Skype visitation, the parties may email or use Viber to communicate with each other for this limited purpose only." CP 7. The Parenting Plan also specifically states:

The respondent shall be prohibited from discussing the mother or her personal life or any legal matters with the child. If the father violates these provisions or becomes emotional during the call, the mother may terminate the Skype call.

CP 7.

At Paragraph 3.10 of the Final Parenting Plan (“Restrictions”), the parties agreed that “the father’s visitation is contingent upon his compliance with the restrictions set forth in this plan.” CP 9.

After entry of the final orders on December 4, 2015, Mr. Abdel Ghani almost immediately began violating the contact restraints in the Decree and Parenting Plan. CP 74. Mr. Abdel Ghani repeatedly contacted Ms. Brewitt outside the scope of what was permissible, including inquiries about her personal life, if Ms. Brewitt was dating, and the religious upbringing of the child. Mr. Abdel Ghani also made contact with Ms. Brewitt through third parties. CP 74-76, 126-128. Mr. Abdel Ghani sent Ms. Brewitt numerous and frequent voice messages on the mobile device application “WhatsApp,” (sometimes on a near daily basis), and he pressured her to play the messages for the child. Mr. Abdel Ghani also sent Ms. Brewitt frequent text messages through “WhatsApp” that were threatening, accusatory, and contained religious overtones. CP 74. In addition, Mr. Abdel Ghani continually asked for more time during the Skype calls, and when Ms. Brewitt declined to agree to his demands and attempted to stick

with the court-ordered fifteen minutes of Skype time, Ms. Brewitt was berated verbally or in writing by Mr. Abdel Ghani for having "no heart" or being "a stone." CP 74, CP 116-121. Ms. Brewitt reported that she frequently had no choice but to disconnect the calls with Mr. Abdel Ghani. CP 74. Ms. Brewitt did not allow for the extra calls, but she reported that the continual requests and ongoing berating of Mr. Abdel Ghani were very stressful and caused her concern. *Id.*

Despite Mr. Abdel Ghani's violations of the no-contact provisions in the Decree, Ms. Brewitt did not immediately seek enforcement of the Decree. Ms. Brewitt indicates that she had hoped to try to handle the situation without involving the court, so that the parties could get to a place where they could have a civil relationship for the sake of the child. CP 126. Unfortunately, Mr. Abdel Ghani's behavior did not stop, and he continued to escalate his violations of the no-contact provisions. CP 126-127. Even when Mr. Abdel Ghani's correspondence did actually relate to the minor child, many of Mr. Abdel Ghani's messages would include commands that Ms. Brewitt take certain parenting steps that he believed were proper. CP 127. If Ms. Brewitt did not respond, Mr. Abdel Ghani would barrage her with more messages. *Id.*

Ms. Brewitt grew very fearful and concerned by Mr. Abdel Ghani's escalating anger and threats toward her and others in her life. CP 128. As

such, on September 20, 2016, Ms. Brewitt filed a Motion to Enforce Decree of Dissolution, in which she requested that the court enter the Protection Order that the parties had agreed she could obtain if Mr. Abdel Ghani violated the no-contact provisions of the Decree. CP 34-72. In his response to the motion, Mr. Abdel Ghani admitted that he had violated the no-contact provisions in the Parenting Plan and Decree, but he blamed Ms. Brewitt, requested that the court ignore his violations, and requested that the court not enforce the parties' agreement. CP 124.

On November 19, 2016, a family court commissioner found that the parties had agreed that a permanent Order of Protection would be entered for both the Petitioner and the child if the Respondent violated the no-contact provisions in the parties' Decree. CP 131-132. The Commissioner specifically found that the father had violated "the contact allowed under the Parenting Plan." *Id.* However, the Commissioner proceeded to overrule the parties' agreement and enter an Order of Protection covering the mother only. CP 133. In the Commissioner's order, the court acknowledged that by declining to include the minor child in the Protection Order, the court was overruling the parties' agreement and a lawful order of the court. CP 132. Although there was no motion to vacate the Decree before the court, the Commissioner decided *sua sponte* that "the case 'Baron' overrules the parties' agreement," and the Commissioner proceeded to vacate the

provisions of the parties' Decree requiring the minor child to be included in the Protection Order.⁴ CP 132.

Ms. Brewitt sought revision of the Commissioner's order. CP 141-177. On December 16, 2016, King County Superior Court Judge Douglass North granted Ms. Brewitt's Motion for Revision, and entered a Protection Order that covered both the minor child and Ms. Brewitt. CP 116, 199-201. Judge North found that the agreed Final Parenting Plan and Decree of Dissolution specifically provided Ms. Brewitt the ability to seek a protective order for both her and the minor child if Mr. Abdel Ghani violated the restrictions in the plan and the no-contact provisions of the Decree. RP 20.⁵ Judge North noted that the holding from *Marriage of Barone* did not apply to the facts of the present case because the Parenting Plan was not being modified with the entry of a Protection Order specifically contemplated by the parties. CP 200, RP 20, lines 9-15. The court noted that Ms. Brewitt's right to obtain a Protection Order was something the parties specifically "contemplated and agreed to at the time the Parenting Plan and Decree were entered into" and that enforcement of the parties' agreement and entering a

⁴ The Commissioner appeared to have been relying on the case *In re Marriage of Barone*, 100 Wn.App. 241, 996 P.2d 654 (2000).

⁵ "RP" refers to the 3/17/17 Verbatim Report of Proceedings from the December 16, 2016 hearing before Judge North.

Protection Order that includes the minor child and the mother “does not result in a ‘de facto modification’ of the Final Parenting Plan.” *Id.*; CP 200.

On July 31, 2017, the Court of Appeals affirmed the Superior Court’s entry of the permanent order of protection for both Ms. Brewitt and the child. Slip Op. at 1. The court rejected Mr. Abdel Ghani’s challenges to the trial court’s ruling, finding that the terms of the Decree and Final Parenting Plan unambiguously provided for a permanent Protection Order for the mother and the child if the contact restraints were violated by Mr. Abdel Ghani, that the court was not restricted to a one-year Protection Order under chapter 26.09 RCW, and that the trial court acted in the child’s best interest in enforcing the parties’ agreed child custody orders.

D. ARGUMENT WHY REVIEW SHOULD NOT BE GRANTED

Mr. Abdel Ghani fails to establish any basis for review of the Court of Appeals’ decision, which affirmed that the trial court did not abuse its discretion with the entry of a permanent Protection Order against Mr. Abdel Ghani, based on the unambiguous terms of the parties’ agreed dissolution Decree and Final Parenting Plan. RAP 13.4(b).

1. THE COURT PROPERLY FOUND THAT THE FATHER’S VIOLATIONS OF CONTACT PROVISIONS ALLOWED FOR THE ENTRY OF A PROTECTION ORDER, WHICH WAS IN THE CHILD’S BEST INTEREST.

The Court of Appeals agreed with the trial court that the parties' Decree of Dissolution and agreed Final Parenting Plan unambiguously provided for a permanent Protection Order for the mother and the child if Mr. Abdel Ghani violated the contact restraints. It is undisputed that Mr. Abdel Ghani violated the restraints; such violations were found by the trial court, they were not challenged by Mr. Abdel Ghani, and therefore were verities on appeal. *In re Marriage of Petrie*, 105 WnApp. 275, 19 P.3d 443 (2001). Based on these facts, the Court of Appeals properly noted that Mr. Abdel Ghani's reliance on authority relating to modification and suspension of visitation rights were unfounded. Slip Op. at 11. Under the terms of the parties' agreed Parenting Plan, Mr. Abdel Ghani already was subject to restrictions under RCW 26.09.191(1), and he had no visitation rights once he violated the contact-restraint provisions; thus, there was no modification of the Parenting Plan.

Contrary to Mr. Abdel Ghani's claims in his Petition for Review, the trial court did in fact find that enforcing the parties' agreed-upon orders and entering a permanent Protection Order was in the child's best interest. The Final Parenting Plan incorporated the parenting evaluator's report by reference, which notes that Mr. Abdel Ghani's history of acts of domestic violence and his history of "being unable to focus solely on developing a relationship with the child without questioning the mother or commenting

about her appearance and attire” was of great concern, and warranted entry of a continuing restraining order to protect the mother and the child. CP 374. The Court of Appeals noted that in granting Ms. Brewitt’s request for enforcement of the Decree and a permanent Protection Order, the trial court specifically found that the very behavior the parenting evaluator had described was ongoing. Slip Op. at 15. Given that Mr. Abdel Ghani did not assign error to the trial court findings, they were verities on appeal. *Petrie*, 105 Wn.App. 275. In light of such findings, the Court of Appeals appropriately concluded that the trial court acted in the child’s best interests by enforcing the agreed child custody orders.

2. THE COURT OF APPEALS PROPERLY FOUND THAT THE AGREED CUSTODY ORDERS WERE UNAMBIGUOUS AND WERE NOT MISREAD BY THE TRIAL COURT.

If the language of a Decree is unambiguous, then there is no room for interpretation. *In re Marriage of Smith*, 158 Wn. App. 248, 256, 241 P.3d 449 (2010). In this case, the trial court and Court of Appeals properly found that when read together, the terms of the Decree and Final Parenting Plan unambiguously provide for a permanent Protection Order for the mother and child if Mr. Abdel Ghani violated the contact restraints set forth in those orders. Slip Op. at 11. Given that the trial court had no room for interpretation in light of the unambiguity of the parties’ agreed orders, the court properly enforced the agreed orders. There is thus no basis for review.

Without citing to legal authority, Mr. Ghani asserts that the parties' Parenting Plan anticipated his violation of the various provisions, and thus, any remedy was intended to be temporary until he returned to compliance. Petition at 15. The appellate court noted, however, that the plain language of the parties' orders specifically contradicts Mr. Abdel Ghani's interpretation, given that "the agreed Final Parenting Plan expressly states, 'the *father's visitation is contingent* upon his compliance with the restrictions set forth in this plan.'" Slip Op. at 9 (emphasis in original). Additionally, the Parenting Plan was incorporated into the dissolution Decree, which stated "The Parties agree that if the father/respondent violates any terms of this order, the mother shall [have] the right to obtain a permanent domestic violence Protection Order against the father..." Slip Op. at 8. Given that the court has no room to interpret language that is unambiguous in a Decree, Mr. Abdel Ghani's alternative interpretation of the parties' custody orders cannot be considered. The Petition for Review should be denied.

E. MOTION FOR ATTORNEY'S FEES

In Washington, an award of attorney's fees is justified where the conduct of one of the parties causes the other "to incur unnecessary and significant attorney fees." *Burrill v. Burrill*, 113 Wn. App. 863, 873, 56 P.3d 993 (2002). Mr. Abdel Ghani, while represented by counsel, agreed to the

very terms that the trial court enforced, and were subsequently affirmed by the Court of Appeals. There is no basis for review by this court, and Mr. Abdel Ghani's actions constitute litigation intransigence. Mr. Abdel Ghani should pay the reasonable attorney fees and costs incurred in responding to his Petition for Review.

F. CONCLUSION

This case presents no appropriate basis for review under RAP 13.4(b), given that the Court of Appeals simply affirmed the agreed-upon terms of the parties' unambiguous Decree and Parenting Plan. For the foregoing reasons, Anne Kari Brewitt respectfully asks this Court to deny review of Islam Gamal El Din Michael Abdel Ghani's petition and to award her fees.

Dated this 23rd day of October 2017.


Caleb M. Oken-Berg
WSBA No. 42970
Attorneys for Respondent
Skellenger Bender, P.S.
1301 Fifth Avenue, Suite 3401
Seattle, WA 98101
(206) 623-6501
coken-berg@skellengerbender.com

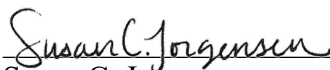
DECLARATION OF SERVICE

The undersigned declares under the penalty of perjury, under the laws of the State of Washington, that the following is true and correct:

That on October 23, 2017, I arranged for service of the foregoing: Respondent's Answer to Petition for Review to the court and to the parties to this action as follows:

| | |
|--|---|
| Office of Clerk Washington State Supreme Court 415 12 th Ave SW Olympia, WA 98501-2314 | <input type="checkbox"/> Facsimile <input type="checkbox"/> Hand-Delivery <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Electronic Mail <input checked="" type="checkbox"/> E-File |
| Islam Abdel Ghani 7 Sedek Selim St. Moharam Bek Alexandria Egypt islam.abdelghani@gmail.com | <input type="checkbox"/> Facsimile <input type="checkbox"/> Hand-Delivery <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Electronic Mail <input type="checkbox"/> E-File |

DATED at Seattle, Washington this 23rd day of October, 2017.



Susan C. Jorgensen

SKELLENGER BENDER, P.S.

October 23, 2017 - 3:09 PM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 94989-1
Appellate Court Case Title: Anne Kari Brewitt v. Islam Gamal El Din Michael Abdel Ghani
Superior Court Case Number: 14-3-06685-0

The following documents have been uploaded:

- 949891_Answer_Reply_20171023150748SC673459_9995.pdf
This File Contains:
Answer/Reply - Answer to Petition for Review
The Original File Name was 2017-10-23 - Respondent Answer to Petition for Review.pdf

A copy of the uploaded files will be sent to:

- islam.abdelghani@gmail.com

Comments:

Sender Name: Caleb Oken-Berg - Email: coken-berg@skellengerbender.com
Address:
1301 5TH AVE STE 3401
SEATTLE, WA, 98101-2630
Phone: 206-623-6501

Note: The Filing Id is 20171023150748SC673459