

FILED
Court of Appeals
Division II
State of Washington
1/24/2019 1:44 PM

NO. 52026-5-II

**COURT OF APPEALS
OF THE STATE OF WASHINGTON
DIVISION II**

IN RE THE ESTATE OF ROBERT CARLTON GILKEY, DECEASED

VICTORIA M. GOMES,

PETITIONER

Vs.

CHRISTINA GILKEY AND JOSEPH GILKEY, AS CO-PERSONAL
REPRESENTATIVES OF THE ESTATE OF ROBERT CARLTON GILKEY,

RESPONDENTS.

RESPONDENTS' BRIEF

Scott E. Blinks
Vander Stoep, Remund, Blinks and Jones
345 N.W. Pacific Avenue
Chehalis, WA 98532

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I. IDENTITY OF RESPONDENTS

Respondents are Joseph E. Gilkey and Christina Gilkey as co-personal representatives of the Estate of Robert Carlton Gilkey. Co-personal representatives are represented by Scott E. Blinks of Vander Stoep, Remund, Blinks & Jones.

II. DECISION BELOW

This is Appellant Gomes' second appeal in this case. Her first appeal requesting discretionary review of the denial of her motion to change venue was denied. Court of Appeals No. 47429-8-II.

Petitioner is now appealing: (1) Ruling on Motion for Reconsideration/Amendment of Judgment, entered by Judge J. Andrew Toynbee, dated May 14, 2018 (SCP 151), and (2) Order Approving Final Report and Petition for Distribution, Approving Fees, Closing Estate (including an oral ruling granting attorney fees of \$2,500.00 as a deduction of any estate distribution to Victoria M. Gomes), entered by Judge J. Andrew Toynbee, entered May 19, 2017 (SCP 152-153).

III. ISSUES PRESENTED FOR REVIEW

i. Whether the Superior Court erroneously entered the May 19, 2017 Order Approving Final Report and Petition for Distribution, Approving Fees, Closing Estate (CP 71-72).

Answer: No.

ii. Whether the Superior Court erred in awarding attorney fees of \$2,500.00 as a deduction of any estate distribution to Victoria M. Gomes, in its oral ruling made May 19, 2017 (Statement of Arrangements).

Answer: No.

iii. Whether the Superior Court erred in not recognizing a Notice of Mediation for a TEDRA proceeding, where a TEDRA petition had not been filed and a TEDRA action had not been initiated.

Answer: No.

iv. Whether the Final Report and Petition for Distribution, with attachments (CP 14-35), filed by the Estate April 17, 2017, and the hearing held May 19, 2017, satisfy Appellant Gomes' request for information and hearing made in Appellant Gomes' Petition for Order RE: Declaration of Completion of Probate, filed April 4, 2017 (CP 12-13).

Answer: Yes.

IV. STATEMENT OF THE CASE

The statements and claimed factual representations in Appellant Gomes' Introduction, starting at Page 3 and running through Page 7, are not supported by any part of the case record, or record on appeal, are incorrect/untrue statements, and should be wholly disregarded by the Court of Appeals.

Robert Carlton Gilkey died January 9, 2015. Probate was initiated in Lewis County Superior Court under cause number 15-4-00038-7 (SCP 121-128). Pursuant to Mr. Gilky's Last Will and Testament, Christina Gilkey and Joseph E. Gilkey were appointed co-personal representatives of the estate (CP 1-11).

Probate was filed in Lewis County because Mr. Gilkey had been the subject of a Thurston County Guardianship proceeding, Thurston County Cause 13-4-00579-9, which was been preassigned to Lewis County Superior Court Judge James Lawler due to a conflict and/or recusal by all Thurston County Superior Court Judges. The conflict/recusal was due to Appellant Gomes' husband being a disbarred attorney who practiced primarily in Thurston County.

Initial Inventory and Appraisement was completed, copy attached hereto under Appendix of Supporting Papers. Report of Affairs was completed and filed June 14, 2016 (SCP 129-132). Updated Report of Affairs was completed filed March 6, 2017 (SCP 133-136).

Estate administration was completed with estate assets being converted to cash, together with the payment of estate debts, obligations and creditor claims (SCP 137-142). The net estate value, at the time of writing this brief, is less than \$40,000.00, plus the value of a vehicle and personal property in the possession of Appellant Gomes which Appellant

Gomes has failed and refused to account for or turn over to the estate (SCP 133-136, and Appendix of Supporting Papers).

In an attempt to avoid unnecessary costs and expense in closing the estate, Declaration of Completion of Probate of Testate Estate and Notice of Filing of Declaration of Completion of Probate were filed March 6, 2017 (SCP 137-142).

In response to the Declaration of Completion and Notice, Appellant Gomes filed Petition for Order RE: Declaration of Completion of Probate, April 4, 2017 (CP 12-13). In response to the petition, the estate completed and filed Final Report and Petition for Distribution, which is signed and verified by both co-personal representatives, and includes a summary of estate administration action, and also detailed information regarding estate assets and costs, expenses and creditor claims (CP 14-35), together with Motion for Order Closing Estate, Approving Fees and Costs and Authorizing Distribution (SCP 143-144). Notice of Hearing on Motion for Order Closing the Estate (SCP 145), and Affidavit of Publication of the Notice of Hearing for Motion for Order Closing the Estate were filed April 26, 2017 (SCP 146-147).

Appellant Gomes filed Objection to Closing Probate Proceedings May 17, 2017 (CP 36-54). The Estate filed Co-Personal Representatives' Response to Victoria Gomes' Objection to Closing Probate Proceedings,

which included the additional detailed information Appellant Gomes requested, on May 18, 2017 (CP 55-70).

The hearing on the estate Final Report and Appellant Gomes' Objection was held May 19, 2017, before Lewis County Superior Court Judge J. Andrew Toynbee. After presentation to the Court by both the estate, by and through Attorney Scott E. Blinks, and Appellant Gomes, on her own behalf, the Court made a ruling which included entry of the Order Approving Final Report and Petition for Distribution, Approving Fees, Closing Estate (CP 71-72), and also including an oral ruling granting attorney fees of \$2,500.00 as a deduction of any estate distribution to Appellant Gomes. The oral ruling granting attorney fees has not been made a written order (Statement of Arrangements).

In response to the order and ruling, Appellant Gomes filed a Motion for Reconsideration/Amendment of Judgment May 30, 2017 (CP 73-111). In response to Appellant Gomes' Motion for Reconsideration, the estate filed Co-Personal Representatives' Response to Victoria Gomes' Motion for Reconsideration (CP 112-114), and Declaration of Joseph E. Gilkey in Support of Co-Personal Representatives' Response to Victoria Gomes' Motion for Reconsideration (SCP 148-149). The Declaration of Joseph E. Gilkey includes the sworn statement that Appellant Gomes and her husband, Ronald Gomes, were responsible for and dissolved a trust

entity and trust document Appellant Gomes now claims should be given weight and effect (SCP 148-149).

Both the Last Will and Testament admitted to probate (CP 1-11), as well as the claimed trust document (attachment to CP 73-111), as well as general probate and trust law, include broad discretionary provisions in favor of the co-personal representatives which, “shall be absolute and uncontrolled” (CP 7 para. C and G, and CP 83 para. 3.03, CP 87 para. 5.03A, CP 96 para. E, and specifically CP 97 para. G., CP 99 para. 6.08, and CP 100 para. 6.10).

The co-personal representatives were not aware of any assets in trust when appointed, and were not able to identify any trust assets during estate administration.

It is the Estate’s position the referenced trust entity and document had been specifically dissolved, and that no trust entity or trust document was in existence at the death of Robert Carlton Gilkey. Regardless, the distribution provisions of the trust are consistent with what the co-personal representatives presented to and which was approved by the court. In addition, the distribution provisions approved by the court, are consistent with the intestate provisions of Washington law, as well as the Last Will and Testament and claimed Trust. RCW 11.04.015.

Judge Toynebee issued his ruling denying Appellant Gomes' Motion for Reconsideration/Amendment May 14, 2018 (SCP 150-153).

Appellant Gomes filed the Notice of Appeal for this action June 13, 2018 (SCP 150-153).

V. STANDARD OF REVIEW

In general, because proceedings for probate of wills are equitable in nature, the Court will review the record de novo. *In re Estate of Black*, 116 Wn. App. 476, 483 (2003), *aff'd* on other grounds, 153 Wn.2d 152 (2004). Findings supported by substantial evidence will be upheld on appeal. *Estate of Cooper*, 81 Wn. App. 79, 89 (1996). The Court may affirm the trial court's ruling on any grounds supported by the record. *In re Estate of Ney*, 183 Wash. 503, 505 (1935). The overriding consideration in Washington probate proceedings is the determination of the decedent's wishes. *In re Estate of Stein*, 78 Wn. App. 251 259 (1995).

Substantial evidence is evidence that is sufficient to persuade a rational, fair-minded person of the truth of the finding. *Miller v. City of Tacoma*, 138 Wn.2d 250, 259-60 (1959).

The probate statutes give the trial court discretionary authority, including to award attorney fees. *Estate of Black*, 116 Wn. App. 476, 489 (2003). The Court will not interfere with the trial court's decision, including to award attorney fees, in a probate matter, absent a manifest

abuse of discretion. *In re Estate of Marks*, 91 Wn. App. 325, 337 (1998), *In re Estate of Larson*, 103 Wn.2d 517, 521 (1985). Discretion is abused when it is exercised in a manner that is manifestly unreasonable, on untenable grounds, or for untenable reasons. *In re Estate of Niehenke*, 117 Wn.2d 631, 647 (1991). A court's decision is manifestly unreasonable if it is outside the range of acceptable choices, given the facts and applicable legal standard; it is based on untenable grounds if the factual findings are unsupported by the record; it is based on untenable reasons if it is based on an incorrect standard of the facts do not meet the requirements of the correct standard. *State v. Rundquist*, 79 Wn. App. 786, 793 (1995) (citing Washington State Bar Ass'n, Washington Appellate Practice Deskbook Sec. 18.5 (2nd ed. 1993)).

The estate submits that de novo review is applicable to issue number one, and substantial evidence review is applicable to issues two, three and four.

VI. ARGUMENT

The rulings entered by Judge Toynbee were supported by the facts of the case and applicable law, and, are appropriate and well within the discretion of the trial court, and should be affirmed by the Court.

- i. *The Superior Court did not erroneously enter the Order Approving Final Report and Petition for Distribution, Approving Fees, Closing Estate, May 19, 2018 (CP 71-72).*

There are absolutely no facts indicating breach of fiduciary duty, mismanagement or wrongful acts on the part of the co-personal representatives. Judge Toynebee properly applied the applicable law to the facts to make reasonable and appropriate rulings. (CP14-35, 55-70, SPC 129-132, 133-136, and Appendix of Supporting Papers).

The Inventory and Appraisement (Appendix of Supporting Papers), Report of Affairs (SCP 129-132), Updated Report of Affairs (SCP 133-136), Final Report and Petition for Distribution (CP 14-35), Co-Personal Representatives' Response to Victoria Gomes' Objection to Closing Probate Proceedings (CP 55-70), and Declaration of Joseph E. Gilkey in Support of Co-Personal Representatives' Response to Victoria Gomes' Motion for Reconsideration (SCP 148-149), provide the trial court with more than substantial evidence for the court's rulings.

- ii. *The Superior Court did not error in awarding attorney fees of \$2,500.00 as a deduction of any estate distribution to Victoria M. Gomes, in its oral ruling made May 19, 2017 (State of Arrangements).*

The Superior Court, or any Court on an appeal may, in its discretion, order costs, including reasonable attorney's fees, to be awarded to any party from any party to the proceedings. RCW 11.96A.150 and CR

11. Fee awards are left to the discretion of the court. *Gillespie v. Seattle-First Nat'l Bank*, 70 Wn. App. 150, 177 (1993). In exercising its discretion, the court may consider any and all factors that it deems relevant and appropriate. RCW 11.96A.150.

An award of attorney's fees is discretionary and will not be overturned on review absent a clear showing of abuse of discretion. *In re Estate of Overmire*, 58 Wn. App. 531, 537 (1990), *In re Boris V. Korry Testamentary Marital Deduction Trust for Wife*, 56 Wn. App. 749, 755, review denied, 114 Wn.2d 1021 (1990); *In re Estate of Eubank*, 50 Wn. App. 611, 621 (1988).

iii. *The Superior Court did not error in not recognizing a Notice of Mediation for a TEDRA proceeding, where a TEDRA petition had not been filed and a TEDRA action had not been initiated.*

A judicial proceeding under RCW 11.96A is a special proceeding under the rules of the Court. RCW 11.96A.090. A judicial proceeding under RCW 11.96A must be commenced as a new action. RCW 11.96A.090(2). A judicial proceeding under RCW 11.96A is to be commenced by filing a petition with the court. RCW 11.96A.100(1).

Appellant Gomes' did not file or serve a TEDRA petition, and did not commence a new action. The notice was therefore defective. Appellant Gomes' did not comply with the requirements to initiate a

TEDRA action, and the trial court was correct in not recognizing the defective notice of mediation.

- iv. *The Superior Court did not error in finding the Final Report and Petition for Distribution, with attachments (CP 14-35), filed by the Estate April 17, 2017, and the hearing held May 19, 2017, satisfy Appellant Gomes' request for information and hearing made in Appellant Gomes' Petition for Order RE: Declaration of Completion of Probate, filed April 4, 2017 (CP 12-13).*

RCW 11.96A.020 confers plenary power on the probate court. *Estate of Black*, 116 Wn. App. 476, 483 (2003); RCW 11.96A.020. The probate court has “full power and authority” to proceed “in any manner and way that to the court seems right and proper, all to the end that the matters be expeditiously administered and settled by the court.” *Id.*

The Court may affirm the trial court’s ruling on any grounds supported by the record. *In re Estate of Nay*, 183 Wash. 503, 505 (1935). The overriding consideration in probate proceedings is the determination of the decedent’s wishes. *In re Estate of Stein*, 78 Wn. App. 251, 259 (1995).

The distribution provisions approved by the court in the Order Approving Final Report and Petition for Distribution, Approving Fees, Closing Estate (CP 71-72), are consistent with the decedent’s wishes as directed in the Last Will and Testament (CP 1-11), the claimed Trust

document (CP 76-111), as well as with the intestate provisions of Washington law. RCW 11.04.015.

VII. ATTORNEY FEES ON APPEAL

The Appellant Court is asked to award attorney fees and costs to the Estate of Robert Carlton Gilkey under RAP 18.1, RCW 11.96A.150, and all other applicable rule and law.

A party is entitled to attorney fees and costs on appeal if a contract, statute, or recognized ground of equity permits recovery of attorney fees and costs and the party is the substantially prevailing party. *Hwang v. MCMahill*, 103 Wn. App. 945, 954 (2000). RCW 11.96A.150 provides either the superior court or any court on an appeal may, in its discretion, order costs, including reasonable attorney's fees, to be awarded to any party: (a) from any party to the proceedings; or (b) from the assets of the estate or trust involved in the proceedings. RCW 11.96A.150(1). This provision applies to all proceedings governed by Title 11. RCW 11.96A.150(2).

The referenced statute provides for an award of attorney fees and costs, and equity called for an award of attorney fees and costs because Appellant Gomes' factual representations are not supported by any part of the case record, or record on appeal, and are incorrect/untrue statements, and her arguments lack merit, rely on misstatements and

misunderstandings of the record, require consideration of facts outside the record, are not adequately briefed, and could not possibly have resulted in a reversal. The Court is asked to make an award to the estate, from Appellant Gomes individually, and from the remaining estate assets.

In addition, RAP 18.9 allows the Court to award attorney fees and costs for filing a frivolous appeal. An appeal is frivolous when the appeal presents no debatable issues on which reasonable minds could differ and is so lacking in merit that there is no possibility of reversal. *Mahoney v. Shinpoch*, 107 Wn. App. 679, 691 (1987). Appellant Gomes appeal is frivolous; (a) because the statements and claimed factual representations in her more than four page introduction are not supported by any part of the case record, or record on appeal, and are incorrect/untrue statements; (b) her arguments lack merit, rely on misstatements and misunderstandings of the record, require consideration of facts outside the record, are not adequately briefed, and could not possibly have resulted in a reversal. RAP 18.9(a). The Court is asked to find this appeal frivolous and make an award to the estate, from Appellant Gomes individually, and from the remaining estate assets.

VIII. CONCLUSION

The trial court's rulings should be affirmed, and Appellant Gomes' appeal rejected. Judge Toynbee's findings are consistent with and

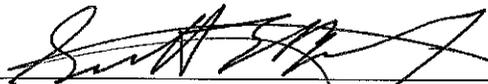
supported by applicable law, and based on facts amounting to substantial evidence.

The distribution provisions approved by the court in the Order Approving Final Report and Petition for Distribution, Approving Fees, Closing Estate, are consistent with the decedent's wishes as directed in the Last Will and Testament, the claimed Trust document, as well as with the intestate provisions of Washington law.

The Court should award costs and attorney fees to the estate from Appellant Gomes (Appellant Gomes is without assets so will not likely be able to satisfy any award within a reasonable time) and the remaining assets of the estate, pursuant to applicable statute, in equity and because this appeal is frivolous.

Respectfully submitted this 24th day of January, 2019.

VANDER STOEP, REMUND, BLINKS & JONES


SCOTT E. BLINKS, WSBA 21837
Of Attorneys for Respondents
Co-Personal Representatives

IX. APPENDIX OF SUPPORTING PAPERS

1
2
3
4
5
6
7 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF LEWIS

8 IN THE MATTER OF THE ESTATE OF) NO. 15-4-00038-7
9)
10 ROBERT CARLTON GILKEY,) INVENTORY AND APPRAISEMENT
11)
12 Deceased.)

13
14 The undersigned co-personal representatives, or the authorized officer thereof, being first
15 duly sworn on oath, says:

16 The schedules attached hereto are a true inventory of all of the property of this estate
17 which has come into Petitioners possession or knowledge, including (1) real property by legal
18 description and assessed valuation of land and improvements there; (2) Stocks and bonds; (3)
19 mortgages, notes and other written evidences of debt; (4) bank accounts and money; (5) furniture
and household goods; (6) all other personal property, statement of all encumbrances, liens or
other secured charges against the items listed thereon.

20 The decedent's date of death was January 9, 2015.

21 
22 CRISTINA GILKEY, Co-Personal Representative

23
24 JOSEPH E. GILKEY, Co-Personal Representative

25
26 INVENTORY AND APPRAISEMENT - 1

LAW OFFICES
VANDER STOEF, REMUND, BLINKS & JONES
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CHEHALIS, WASHINGTON 98532
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1	1.	<u>REAL PROPERTY:</u>	<u>VALUE</u>
2		3093 Carpenter Hills Loop SE	\$ 95,000.00
3		Lacey, WA 98503 (subject to Livewell	appraised value
4		Financial Reverse Mortgage of \$134,598.54)	
		Tax Parcel No. 39250003000	
5	2.	<u>STOCKS AND BONDS:</u>	
6		None known	
7	3.	<u>BANK ACCOUNTS AND MONEY:</u>	
8		Funds received from guardianship	\$ 71,169.62
9	4.	<u>FURNITURE AND HOUSEHOLD GOODS:</u>	
10		Misc. personal property	\$ 500.00
11			estimated value
12	5.	<u>ALL OTHER PERSONAL PROPERTY:</u>	
13		Note receivable -- Victoria and Ronald Gomes	\$ 12,338.05
14		(loan - related to automobile)	unpaid balance
15		Life Insurance (USA Life)	\$ 2,235.00
16			actual benefit
17		Mass Mutual Life	\$ 14,071.49
18			actual benefit
19		DR Backhoe	\$ 4,750.00
20			Estimated value
21		Personal property held by Victoria and Ronald Gomes	value unknown
22		(electronics, laptop computer, tools and supplies)	
23		Personal property and building supplies at	\$15,000 - \$18,000
24		3093 Carpenter Hills Loop SE, Lacey, WA	estimated
25	6.	<u>VEHICLES:</u>	
26		2005 Nissan Pathfinder	\$ 3,000.00
			estimated value

VANDER STOEP, REMUND, BLINKS & JONES

January 24, 2019 - 1:44 PM

Transmittal Information

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Appellate Court Case Title: In re the Estate of Robert Carlton Gilkey
Superior Court Case Number: 15-4-00038-7

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