

IN THE COURT OF COMMON PLEAS

HAMILTON COUNTY, OHIO

CASE NUMBER: A1402190

JUDGE STEVEN E. MARTIN

MCKENZIE DAVIS

PLAINTIFF

vs.

DELHI TOWNSHIP OHIO DBA  
DUNGEONS OF DELHI, ET AL.

DEFENDANTS

\* \* \* \* \*

DEPONENT:

KARA RIDDER

DATE:

DECEMBER 30, 2015

\* \* \* \* \*

Mindy Davis

Certified Court Reporter

INDEX

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

	Page
Cross-Examination By Mr. Rinear	4
Cross-Examination By Mr. Dall	24

EXHIBITS

	Page
Defendant's Exhibit 1	16

1           The deposition of KARA RIDDER, taken for the  
2 purpose of discovery and/or use as evidence in the  
3 within action, pursuant to notice, heretofore taken  
4 at the office of Droder & Miller, 125 West Central  
5 Parkway, Cincinnati, Ohio, on December 30, 2015, at  
6 10:00 a.m., upon oral examination, and to be used in  
7 accordance with the Ohio Rules of Civil Procedure.

8                                   \* \* \* \* \*

9                                   APPEARANCES

10          ATTORNEY FOR PLAINTIFF:

11          Thomas J. Dall, Jr., Esq.  
12          LAW OFFICES OF BLAKE R. MAISLIN, LLC  
13          2260 Francis Lane  
14          Cincinnati, Ohio 45206  
15          (513)721-5555

16          ATTORNEY FOR DEFENDANTS:

17          Richard J. Rinear, Esq.  
18          DRODER & MILLER  
19          125 West Central Parkway  
20          Cincinnati, Ohio 45202  
21          (513)721-1504

22                                   \* \* \* \* \*

23  
24  
25

1 KARA RIDDER,  
2 called on behalf of the Defendants, after having  
3 been first duly sworn, was examined and deposed as  
4 follows:

5 MR. RINEAR: Before we begin, we are on  
6 the record for the deposition of Kara Ridder.  
7 It is after 10:15. Blake Maislin's office was  
8 notified of this deposition, in fact,  
9 confirmed it with us yesterday, and no one  
10 from his office has appeared so we're going to  
11 proceed.

12 CROSS-EXAMINATION

13 BY MR. RINEAR:

14 Q. Can you state your full name and spell  
15 your last name for me, please?

16 A. Kara Ridder, R-I-D-D-E-R.

17 Q. And what is your address?

18 A. 5464 Childs Avenue.

19 Q. What's the zip there?

20 A. 45248.

21 Q. Ms. Ridder, my name is Rick Rinear. I  
22 represent the Dungeons of Delhi, the haunted house  
23 that was in Delhi for years. McKenzie Davis has  
24 filed a lawsuit against the Dungeons of Delhi. Were  
25 you aware of that?

1 A. Uh-huh.

2 Q. You have to answer verbally so she can get  
3 that down.

4 A. Yes.

5 Q. We're here today because you've been  
6 listed as a potential witness by her if this case  
7 goes to trial, okay?

8 A. Okay.

9 Q. So what we're going to do today is a  
10 deposition. That is I'm going to ask you questions  
11 and you answer my questions as best you can, okay?

12 A. Okay.

13 Q. Couple of ground rules. One, I just  
14 mentioned to you, try to keep your answers verbal  
15 because the court reporter is taking everything  
16 down. If you nod your head, it makes it a little  
17 more difficult for her. I might remind you about  
18 that. I'm not trying to be rude, just so that she  
19 can get it down, okay?

20 A. Okay.

21 Q. If I ask you a question and you're not  
22 sure what I'm asking, please tell me. I'm not here  
23 to trick you or confuse you, I just want to find out  
24 what you know, all right?

25 A. Okay.

1 Q. Have you ever given a deposition like this  
2 before?

3 A. No.

4 Q. Okay. The only other thing I would tell  
5 you is this is not going to take very long, but if  
6 you need a break or something to drink or whatever,  
7 please tell me, okay?

8 A. Okay.

9 Q. Let me just get a little of background  
10 from you. What's your age?

11 A. I'm 20.

12 Q. And were you born and raised in  
13 Cincinnati?

14 A. Yes.

15 Q. West side of town?

16 A. Yeah.

17 Q. Where did you go to high school?

18 A. I went to Seton.

19 Q. What year did you finish there?

20 A. 2013.

21 Q. And what do you do now? Are you employed  
22 in college or what do you do?

23 A. Both.

24 Q. Okay. Where do you go to college?

25 A. UC Blue Ash.

1 Q. And where do you work?

2 A. Gabriel Brothers.

3 Q. Do you know McKenzie Davis?

4 A. Yes.

5 Q. How did you originally come to know her?

6 A. I knew her in grade school. We went to  
7 high school together too.

8 Q. Were you friends with her or did you just  
9 know her from --

10 A. No, we're friends.

11 Q. Okay. When did you first start being  
12 friends with her where you would actually do things  
13 together?

14 A. I was probably like nine.

15 Q. Okay. And are you still friends with her  
16 today?

17 A. Yeah.

18 Q. How often around now do you see her or  
19 talk to her?

20 A. I don't see her as much anymore, probably  
21 a month, maybe a little less, every couple of  
22 months.

23 Q. Were you aware at or around the time that  
24 she had this fall at the Dungeons of Delhi that this  
25 happened with her?

1 A. No.

2 Q. How did you first become aware that she  
3 had that accident?

4 A. She told me about it.

5 Q. Do you remember approximately how long  
6 after it actually happened that she told you about  
7 it?

8 A. I do not.

9 Q. And what did she tell you happened?

10 A. She just told me that she was there, I  
11 guess, and she like just fell like running away or  
12 something.

13 Q. Okay. Did she tell you why she was  
14 running or what happened?

15 A. I guess because someone scared her. It's  
16 a haunted house, so yeah.

17 Q. Did she tell you who she was with at the  
18 haunted house?

19 A. I think she was with our friend Sydney and  
20 Allison I think.

21 Q. Do you know both of them, Sydney and  
22 Allison?

23 A. Yeah.

24 Q. And Sydney would be Sydney Terry?

25 A. Yeah.



1 Q. And Allison is Allison Sweet, right?

2 A. Yeah.

3 Q. Have you talked to either of them about  
4 what happened that day at the haunted house?

5 A. I don't think I ever talked to Allison,  
6 but I think I talked to Sydney about it.

7 Q. What do you remember her telling you?

8 A. I have no idea.

9 Q. Too long ago?

10 A. Yeah, it was too long ago.

11 Q. I'll tell you that this happened in  
12 October of 2012, is when the accident happened.  
13 Before that, tell me about McKenzie health-wise; was  
14 she a healthy person, did she have health problems  
15 or issues, as far as you know?

16 A. Well, she always was kind of getting hurt,  
17 so...

18 Q. Okay. Tell me what you mean by that.

19 A. Like she always seemed to be like sick or  
20 hurt or something, like little things or -- mostly  
21 it was like little things, though, but it was still  
22 like she always seemed like something was wrong.

23 Q. Was she going to doctors a lot and that  
24 sort of thing, if you know? I don't want you to  
25 guess at this.

1           A.    I don't know, but I know she would like  
2 get hurt or like she -- it was mostly like, kind of  
3 like feeling sick, like stomach or headaches or  
4 stuff like that.

5           MR. RINEAR:  Let's go off the record a  
6 minute.

7                               (OFF THE RECORD)

8           MR. RINEAR:  For the record, we were  
9 contacted by Blake Maislin's office about this  
10 deposition about a half hour ago.  They said  
11 they were going to send somebody.  His office  
12 is less than 10 minutes from here.  We've now  
13 waited for a half hour and nobody's here so  
14 we're going to proceed.

15 BY MR. RINEAR:

16           Q.    Ms. Ridder, before we brought you in for  
17 this deposition -- I think they're here now.

18                               (AT THIS TIME, THOMAS DALL ENTERS DEPOSITION)

19 BY MR. RINEAR:

20           Q.    Ms. Ridder, I started to ask you at any  
21 time before this deposition, did McKenzie Davis ever  
22 tell you that she was listing you as a potential  
23 witness in this case?

24           A.    Yes.

25           Q.    When did she tell you that?

1 A. I can't remember.

2 Q. Was it a while ago?

3 A. Yeah, it was a while ago.

4 Q. And what did she tell you she was  
5 expecting that you would testify to or you would  
6 bring to the table in her case?

7 A. She didn't really like go much into it,  
8 but I wasn't really there so I'm not sure what I'm  
9 supposed to, you know, be a witness to.

10 Q. When she told you that she was going to  
11 list you, she didn't really say why?

12 A. Yeah, not really. I didn't really ask.

13 Q. Okay. When you got the subpoena for this  
14 deposition today, did you contact McKenzie at all?

15 A. Yeah.

16 Q. What did the two of you talk about there?

17 A. I just like asked her like I was  
18 subpoenaed to do this and I asked her like why. And  
19 she said, oh, no, like just call Blake Maislin and  
20 talk to him about it. And I'm like, okay.

21 Q. Okay. Did you do that?

22 A. No.

23 Q. You never talked to anybody at Blake  
24 Maislin's office?

25 A. No.

1 Q. Sydney Terry, do you know how to get ahold  
2 of her?

3 A. Uh-huh.

4 Q. Do you have a phone number and address,  
5 anything for her?

6 A. I don't have her like address, but I know  
7 where she lives. She has a phone.

8 Q. Okay. Where does she live?

9 A. She lives in Cincinnati. She lives over  
10 the river in that general area. Her house is like  
11 overlooking the river almost.

12 Q. On the west side?

13 A. Yeah, west side.

14 Q. Like up near Mount St. Joe, somewhere up  
15 that way? Do you know where Mount St. Joe is, off  
16 the end of Neeb Road, out that way in Delhi?

17 A. Yeah, over there.

18 Q. Does she live with her parents or does she  
19 have an apartment?

20 A. She lives with her parents.

21 Q. Do you know her parents' names?

22 A. No.

23 Q. Do you know if her parents' last names are  
24 Terry?

25 A. No.

1 Q. They're not or you don't know?

2 A. They're not Terry.

3 Q. What is their last name, do you know?

4 A. I believe her mom is Hess, at least that's  
5 her maiden name. I know she just got married like a  
6 couple years ago.

7 Q. I'm just asking because we've been trying  
8 to contact her and we don't know how to get ahold of  
9 Sydney Terry. We don't know where she lives. I'm  
10 just asking if you have any contact information?

11 A. I mean, I have her cell phone number.

12 Q. Do you mind giving that to me?

13 A. Yeah. I'll have to go get my phone,  
14 though.

15 Q. Okay. Does she have an e-mail address, do  
16 you know?

17 A. Probably, but I don't know it.

18 Q. Okay. So after we're finished with the  
19 deposition, if you could give me her cell phone, I  
20 would appreciate that?

21 A. I can do that.

22 Q. Have you ever spoken to Sydney Terry about  
23 this lawsuit or you guys being witnesses, anything  
24 of that nature at all?

25 A. No.

1 Q. Have you spoken to Allison Sweet about  
2 this lawsuit or this case?

3 A. I think like back when it first happened,  
4 but I haven't seen her in a long time. I haven't  
5 seen her in years.

6 Q. Are you still pretty good friends with  
7 Sydney Terry? Do you still see her?

8 A. Yeah, I still see her. She's kind of a  
9 hard person to get ahold of.

10 Q. She's a very hard person to get ahold of.  
11 Do you know Joe Giovanetti?

12 A. Yes.

13 Q. Are Joe and McKenzie still dating, do you  
14 know?

15 A. No.

16 Q. They're not?

17 A. No.

18 Q. How long has that been off, do you know?

19 A. I think maybe like a couple months maybe  
20 because I never -- because I know she told me maybe  
21 like a month ago, but she said that it happened  
22 before that, she just hadn't told anybody.

23 Q. What does McKenzie Davis do now? What is  
24 she doing, schoolwork or whatever?

25 A. I know she's in school for nursing.

1 Q. Do you know where she goes to school?

2 A. Good Sam. Yeah, Good Sam.

3 Q. Generally, what kind of things do you and  
4 McKenzie do these days? If you're going to get  
5 together and do stuff, what kind of things do you  
6 do?

7 A. I don't see her that often, and she like  
8 has the whole ankle thing. So when we go out, we  
9 don't really do much. She can't walk for very long.  
10 We're usually like in her house like hanging out.

11 Q. Okay. Has she talked to you at all about  
12 this lawsuit?

13 A. Not really.

14 Q. One of the issues that McKenzie talked  
15 about when I took her deposition was this whole  
16 incident of what happened at the Dungeons of Delhi,  
17 okay? And one of the people she has sued is a guy  
18 named Matt Mateikat. Do you know Matt?

19 A. Uh-huh.

20 Q. How do you know Matt?

21 A. I met him a few times through Sydney.

22 Q. Are he and Sydney friends?

23 A. They were. I don't know if they are  
24 anymore. She used to work at Dungeons.

25 Q. You said you met Matt a couple times?

1 A. Yeah.

2 Q. Do you know if that was before or after  
3 McKenzie's accident?

4 A. I do not.

5 Q. Did you ever speak with Matt about the  
6 accident?

7 A. No.

8 Q. It's McKenzie's claim in this case that  
9 Matt was one of the characters in the haunted house  
10 and that he chased her, okay? Is that part of what  
11 you understand?

12 A. Yeah.

13 Q. Do you have any knowledge as to whether  
14 Matt Mateikat actually chased her at this haunted  
15 house?

16 A. I have no idea. I wasn't there.

17 Q. You never spoke with Matt about that?

18 A. No.

19 Q. I want to show you a document that we got  
20 from McKenzie.

21 (Defendant's Exhibit 1 was marked for  
22 identification.)

23 Q. This is a screen shot of a text. It's  
24 undated. I don't know when it supposedly happened.  
25 She hasn't given us a date. But what she testified



1 to was that you told her by this text that Matt  
2 Mateikat was the one who chased her at the haunted  
3 house. Do you recognize this text?

4 A. I guess. It was a long time ago.

5 Q. Do you have any recollection of sending  
6 this to McKenzie?

7 A. Somewhat.

8 Q. Presumably the green writing --

9 A. I mean, she like told me, like she like  
10 described him. I was like I guess it's Matt,  
11 because like I know what his character looks like,  
12 but I wasn't there so I don't know if it was exactly  
13 him.

14 Q. Okay. So when she described him, you knew  
15 what character he played at the haunted house?

16 A. Yeah. I know what he looks like.

17 Q. So that's how you came up with sending her  
18 this text?

19 A. Yeah.

20 Q. But just so we're clear, you never spoke  
21 to Matt. He never told you, yeah, I did this,  
22 anything like that?

23 A. No.

24 Q. What character do you recall him being at  
25 the haunted house?

1           A.    He had like black hair I remember, but  
2 that's like the only thing I remember about it.

3           Q.    Did you ever go to the Dungeons of Delhi?

4           A.    Uh-huh.

5           Q.    You did?

6           A.    Yeah.

7           Q.    You have to answer verbally, I'm sorry.

8           A.    Yeah, I did.

9           Q.    More than once?

10          A.    I think I only went once.  And then I hung  
11 out with him and some other people one night and we  
12 like did -- we all liked dressed up and I went there  
13 to like get dressed up and that.

14          Q.    Did you ever work or volunteer at the  
15 haunted house?

16          A.    No.

17          Q.    Have you ever volunteered at any haunted  
18 house?

19          A.    No.

20          Q.    So what was the purpose of getting dressed  
21 up the one night that you did?

22          A.    Because it was fun.

23          Q.    Just for fun?

24          A.    Yeah.

25          Q.    Was it at the time the haunted house was

1 running?

2 A. No. I didn't like do it for the haunted  
3 house. We were like just doing it for fun.

4 Q. Okay. Do you know Matt's dad Mark?

5 A. No.

6 Q. Never met him?

7 A. I don't think so.

8 Q. Okay. Do you recall whether the time you  
9 went to the haunted house was before or after  
10 McKenzie's accident? Again, I don't want you to  
11 guess. If you remember --

12 A. Yeah, I don't remember.

13 Q. Okay. When you went, were there any  
14 problems, issues, difficulties?

15 A. No.

16 Q. Were there any characters outside of the  
17 haunted house?

18 A. Yeah. My friend used to work there and he  
19 would be outside.

20 Q. Doing what?

21 A. Just like standing there like scaring  
22 people. It's a haunted house, so...

23 Q. Would people take pictures with him and  
24 that kind of thing, do you know?

25 A. Yeah.

1 Q. So there would be characters walking  
2 around outside?

3 A. Yeah. Uh-huh.

4 Q. Did you ever see a character there chasing  
5 anybody?

6 A. No.

7 Q. When you left, you went out the other side  
8 of the building?

9 A. Yeah.

10 Q. Which would actually be toward the front,  
11 toward Delhi Road, right?

12 A. Yeah.

13 Q. Were there characters outside back there?

14 A. Yes.

15 Q. So there would be characters both sides of  
16 the building outside as well?

17 A. Yeah. Uh-huh.

18 Q. You ever been to any other haunted houses?

19 A. I've been to the Dent Schoolhouse.

20 Q. Do you recall if that was before or after  
21 you went to the Dungeons of Delhi?

22 A. I think both, been there before and after.

23 Q. Did you notice any real differences on how  
24 the Dent Schoolhouse was run compared to the  
25 Dungeons of Delhi?

1 A. No.

2 Q. They're both haunted houses?

3 A. Yeah.

4 Q. They're both there to scare you and  
5 startle you and have fun, right?

6 A. Yeah.

7 Q. Both have characters and rooms and props  
8 and all that kind of stuff, right?

9 A. Yeah.

10 Q. And the Dent has characters outside as  
11 well, don't they?

12 A. Yes.

13 Q. In fact, they have a whole graveyard area  
14 set up out front?

15 A. Yes.

16 Q. Did McKenzie, I might have asked you this  
17 already, but has McKenzie ever told you with any  
18 detail at all why she's suing the Dungeons of Delhi?

19 A. I mean, she just told me that she got like  
20 chased and I guess fell while she was running away,  
21 but that was about it.

22 Q. Did she ever tell you if she tripped on  
23 something or why she fell or any details about that  
24 at all?

25 A. She just said she fell running away.

1 Q. Other than what you told her in this text,  
2 do you know -- I mean, have you ever discussed with  
3 her how she knows or believes that it was Matt  
4 Mateikat that chased her?

5 A. Just by like how she described him, like  
6 the person who chased her.

7 Q. Just the character, how they were dressed,  
8 that sort of thing?

9 A. Yeah.

10 Q. And, again, neither Joe or Allison -- was  
11 Sydney the other person that was with them that  
12 night?

13 A. I think so.

14 Q. Did any of them ever give you any details  
15 about what happened at the time of McKenzie's  
16 accident?

17 A. No.

18 Q. Is there anything else that you can  
19 remember that you were told about this accident  
20 that --

21 A. Not really.

22 Q. -- you remember at all? No?

23 A. No.

24 Q. Okay. I only ask because this is my only  
25 chance to talk to you --

1 A. Yes.

2 Q. -- and I don't want to get into trial and  
3 all the sudden you're talking about other things  
4 that we didn't get a chance to talk about today. So  
5 if there's anything else you remember about this  
6 that you know, I'd ask you to let me know?

7 A. Yeah, I'm not sure. It was like three  
8 years ago and I wasn't there, honestly. I mean, I'm  
9 sure they told me about it at the time, but I don't  
10 remember what they said.

11 Q. Just don't remember?

12 A. Yeah. I would ask like Sydney because  
13 Sydney like -- she was really good friends with  
14 Matt. They like hung out a lot and they worked at  
15 the Dungeons together. So if she was there, she  
16 would probably like know and recognize him.

17 Q. Do you know how many years Sydney worked  
18 at the Dungeons?

19 A. I want to say at least two, because my  
20 friend Alex works there too. Well, he used to. I  
21 think it shut down.

22 Q. Yeah. Do you know -- I mean, if Sydney  
23 was with them that night, obviously she wasn't  
24 working that night?

25 A. Yeah.

1 Q. Was she working that year at the haunted  
2 house, do you know, or did she work before that or  
3 after that?

4 A. She had to have been because she met --  
5 I'm pretty sure she met Matt through the haunted  
6 house when she worked there, so she had to have been  
7 working there.

8 MR. RINEAR: That's all the questions I  
9 have. Counsel may have a couple questions for  
10 you. And then after we're finished, if you  
11 could get your phone and get me Sydney's phone  
12 number, I would appreciate that.

13 THE WITNESS: I can do that.

14 CROSS-EXAMINATION

15 BY MR. DALL:

16 Q. Hi, Kara. My name is Tom. I'm from Blake  
17 Maislin's office. You'll have to pardon my voice.  
18 I'm struggling with that right now. So if you can't  
19 hear or understand me, please let me know, I'll be  
20 happy to repeat it.

21 A. Okay.

22 Q. I have a few questions relating to Matt  
23 Mateikat's character he was playing at the haunted  
24 house. What did McKenzie tell you when she  
25 described this character to you that made you think



1 Matt Mateikat?

2 A. I don't really remember.

3 Q. I mean, you mentioned the black hair  
4 specifically --

5 A. I know he had like black hair. I feel  
6 like he was a janitor maybe.

7 Q. Matt Mateikat, is he a very tall guy,  
8 short guy?

9 A. He's pretty tall.

10 Q. How tall would you say? Do you think he's  
11 taller than me? I'll stand up. I'm all of 6'2".  
12 Do you think he's taller than me?

13 A. He's probably like around your height  
14 maybe. I'm like 5'2" and everyone's taller to me,  
15 so...

16 Q. Did he use any props for his character?

17 A. I don't remember.

18 Q. So he never used anything to make himself  
19 look more scary?

20 A. Probably wore like makeup and stuff.

21 Q. What kind of makeup would he wear?

22 A. Probably like, what's it called, like  
23 Latex and blood.

24 Q. Did he wear a mask?

25 A. I don't think he wore a mask.

1 Q. If he were to be in character, would you  
2 recognize him easily if you saw him?

3 A. Probably not. I'm pretty sure most people  
4 changed their characters every year.

5 Q. So you could go through this Dungeons of  
6 Delhi and he could be there and you wouldn't even  
7 recognize him?

8 A. Probably not.

9 Q. What kind of interactions would the  
10 characters that would stand outside of the haunted  
11 house have with people that were in line?

12 A. They just kind of walk around. They'll  
13 walk up to you and like basically try to scare you,  
14 make weird noises, stuff like that.

15 Q. I think you testified earlier, you said  
16 you'd never seen anybody chased, right?

17 A. Huh-uh.

18 Q. Did you ever see anybody run away?

19 A. I don't think so. I mean, I've seen  
20 people hide behind other people, stuff like that.

21 MR. DALL: I don't think I have anything  
22 else.

23 MR. RINEAR: That's all the questions for  
24 you. The court reporter was taking down  
25 everything that we said. She will be typing

1           this up and you have the right, if you want  
2           to, to read it to make sure she got everything  
3           down accurately, which would mean you'd have  
4           to go over to her office and sit down and read  
5           it, or you can waive that right. That's your  
6           choice. I can't make that choice for you.  
7           You can't go in and change your testimony,  
8           it's just to make sure she got it down  
9           accurately. So you need to let her know  
10          whether you want to read it or you want to  
11          waive your right to read it. I will tell you  
12          most people waive their right, but I'm not  
13          trying to influence you one way or the other.  
14          It's your call. If you want to read it,  
15          you'll get a notice from the court reporter.  
16          You'll have to go to her office and read it  
17          within a couple weeks, so just let her know  
18          what you want to do.

19                   THE WITNESS: I'll just waive it.

20                                   (Witness excused.)

21                                   (Deposition concluded at 11:10 a.m.)

22          Signature expressly waived

23          KARA RIDDER

DATE

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2 STATE OF OHIO )

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4 I, Mindy Davis, Notary Public for the State of  
5 Ohio, do hereby certify:

6 That the witness named in the deposition, prior  
7 to being examined, was by me duly sworn;

8 That said deposition was taken before me at the  
9 time and place therein set forth and was taken down  
10 by me in shorthand and thereafter transcribed into  
11 typewriting under my direction and supervision;

12 That said deposition is a true record of the  
13 testimony given by the witness and of all objections  
14 made at the time of the examination.

15 I further certify that I am neither counsel for  
16 nor related to any party to said action, nor in any  
17 way interested in the outcome thereof.

18 IN WITNESS WHEREOF I have subscribed my name  
19 and affixed my seal this 12th day of January, 2016.

20

21

22 MINDY DAVIS

23 Notary Public

24 My Commission expires: 04/03/16

25