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FILED July 23, 2018  
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SANDERS COUNTY CLERK OF DISTRICT COURT  
BY [Signature]  
DEPUTY

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MONTANA TWENTIETH JUDICIAL DISTRICT COURT, SANDERS COUNTY

ALEXIS NUNEZ and HOLLY  
McGOWAN,

Plaintiffs,

v.

WATCHTOWER BIBLE AND TRACT  
SOCIETY OF NEW YORK, INC.;  
WATCHTOWER BIBLE AND TRACT  
SOCIETY OF PENNSYLVANIA, INC.;  
CHRISTIAN CONGREGATION OF  
JEHOVAH'S WITNESSES and  
THOMPSON FALLS CONGREGATION  
OF JEHOVAH'S WITNESSES,

Defendants.

Hon. James A. Manley  
Cause No. DV 16-84

RESPONSE TO PLAINTIFFS'  
MOTION FOR PARTIAL SUMMARY  
JUDGMENT AS TO DEFENDANTS'  
THIRD-PARTY CLAIMS AGAINST  
IVY MCGOWAN-CASTLEBERRY,  
BY DEFENDANTS WATCHTOWER  
BIBLE AND TRACT SOCIETY OF  
NEW YORK, INC. AND CHRISTIAN  
CONGREGATION OF JEHOVAH'S  
WITNESSES

WATCHTOWER BIBLE AND TRACT  
SOCIETY OF NEW YORK, INC.;  
CHRISTIAN CONGREGATION OF  
JEHOVAH'S WITNESSES and  
THOMPSON FALLS CONGREGATION  
OF JEHOVAH'S WITNESSES,

Third-Party Plaintiffs,

v.

MAXIMO NAVA REYES, MARCO  
NUNEZ, IVY MCGOWAN-  
CASTLEBERRY,

Third-Party Defendants.

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Defendants/Third-Party Plaintiffs Watchtower Bible and Tract Society of New York, Inc. ("Watchtower NY"), Christian Congregation of Jehovah's Witnesses ("CCJW") and the Thompson Falls Congregation of Jehovah's Witnesses ("Thompson Falls Congregation") (collectively "Religious Defendants") respectfully respond to Plaintiffs' Motion for Partial Summary Judgment as to Defendants' Third-Party Claims against Ivy McGowan-Castleberry.

## I. INTRODUCTION

This case is about incest perpetrated on the Plaintiffs by several family members over a long period of time. Plaintiffs have sued the Religious Defendants for child sexual abuse by a family member, Maximo Reyes ("Reyes"). Their theories of liability include agency, failure to protect, and failure to report Reyes to the police. The Religious Defendants have cross-claimed against other family members, including Ivy McGowan-Castleberry, who made Plaintiffs available to their abusers despite her knowledge of

incest within the family—all of which combined to cause the injuries and damages at issue in this case.

Ivy McGowan-Castleberry, the mother of Alexis Nunez and sister of Holly McGowan, did not file a motion seeking to be dismissed from the case. Instead, Plaintiffs have asked the Court to dismiss Ivy, arguing that she should not be a third-party defendant because she owed no duty to protect her sister from Max Reyes and because the abuse by Marco Nunez has not been alleged as a bad act by Plaintiffs. Under Montana law, Ivy assumed a duty to Holly and had a duty to Alexis, both of which she violated when she allowed Marco and Max to have access to them. The jury should be able to compare her conduct with that of all the potentially liable parties and assign comparative fault accordingly.

## II. FACTUAL BACKGROUND

This case involves multiple years of abuse suffered by Plaintiffs at the hands of several family members. Holly and Alexis were both abused by Max Reyes (their stepfather and step-grandfather, respectively) and were both abused by Marco Nunez (their brother-in-law and father, respectively).

When she was a minor, Holly was living at the home of Ivy and Marco Nunez in Nebraska, where she was abused by Marco. 10th Found. Aff. Kathleen L. DeSoto ¶¶ 3-4, July 20, 2018 (“10th Aff. DeSoto”), Ex. 1: Dep. Holly McGowan 73:4-5, 140:15-142:23, Jan. 8, 2018 (“Dep. McGowan”); Ex. 2: Dep. Joni Navo Nunez (sic) 62:17-25, Feb. 3, 2018. Prior to the abuse in Nebraska, Marco abused Holly in the 1994-96 time period while in Plains, Montana. Dep. McGowan 134:21-138:24. The abuse was frequent, and

included fondling, digital penetration, attempted rape, and oral sex. Dep. McGowan 137:3-138:21. In 1998, Marco was convicted of inappropriate sexual contact with a different minor and required to register as a sex offender. 10th Aff. DeSoto ¶ 5, Ex. 3: Dep. Ivy McGowan-Castleberry 77:10-78:11, Jan. 10, 2018 (“Dep. Ivy”).

Ivy alleges that in 1998 (when she was an adult and Holly still a minor), she learned of Max’s abuse of Holly and took Holly to the home of Don Herberger to get help and to stop the abuse by Max.<sup>1</sup> Dep. Ivy 44:5-11, 47:2-8. Ivy also learned that Max had fondled Holly’s breasts in front of one of Ivy’s co-workers. Dep. Ivy 44:17-45:24. Although she was an adult, Ivy took no steps to protect her sister Holly from Max Reyes and returned her to the family home. Dep. Ivy 46:3-48:9. She did not follow up with anyone to ensure action was taken against Max. Dep. Ivy 53:12-21. Likewise, in 2001, she took no steps to warn Holly that Marco was a sexual predator and allowed Holly to live with her in her home, where Marco continued to sexually assault Holly. Dep. Ivy 77:6-13, 78:2-11, 80:10-15.

Ivy McGowan-Castleberry is Alexis’s mother, and she has acknowledged that she had legal custody over Alexis. Dep. Ivy 86:18-87:3. Ivy did not take steps to protect Alexis from Marco, even though she knew he was a registered sex offender, convicted of inappropriate sexual contact with a minor babysitter for their children. Dep. Ivy 77:6-79:2. Despite knowing that Max had sexually abused her sister, Ivy personally arranged for Alexis and her other children to stay in the home with her mother (Joni) and

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<sup>1</sup> Religious Defendants deny this happened, but for the purpose of this Motion only and to establish Ivy McGowan-Castleberry’s knowledge, assume it is true.

stepfather (Max), so they could babysit the children. Dep. Ivy 95:2-97:12. Ivy admits that every time Alexis was exposed to Max, it was with her consent, as she voluntarily and willingly let her children stay at his house:

Q. Would your mom ever get the kids without your permission?

A. No.

Q. Okay. So every time Alexis was exposed to Max was really with your consent?

A. Yep, --

Q. Okay.

A. ---from that perspective.

Dep. Ivy 102:1-8.

### III. DISCUSSION

#### A. Summary Judgment Standard.

Pursuant to Montana Rule of Civil Procedure 56(c)(3), summary judgment is only appropriate when “there is no genuine issue as to any material fact and . . . the movant is entitled to judgment as a matter of law.” If the moving party has met its burden to show this, then the burden shifts to the non-moving party to establish an issue of material fact.

*Rosenthal v. Cnty. of Madison*, 2007 MT 277, ¶ 22, 339 Mont. 419, 170 P.3d 493.

“However, ‘all reasonable inferences which may be drawn from the offered proof must be drawn in favor of the party opposing summary judgment.’” *Rosenthal*, ¶ 22 (citation omitted); *see also Estate of Watkins v. Hedman, Hileman & Lacosta*, 2004 MT 143, ¶ 12, 321 Mont. 419, 91 P.3d 1264. A “material fact” is one which “involves the elements of the cause of action or defenses at issue to an extent that necessitates resolution of the

issue by a trier of fact.” *Corp. Air v. Edwards Jet Ctr. Mont., Inc.*, 2008 MT 283, ¶ 24, 345 Mont. 336, 190 P.3d 1111 (citation omitted). Summary judgment “should never be a substitute for a trial on the merits if a controversy exists over a material fact.” *Corp. Air*, ¶ 24.

**B. Ivy McGowan-Castleberry Was Negligent and Contributed to Holly’s Damages.**

Although the motion appears to address only Ivy’s duty to Holly McGowan, Plaintiffs have asked the Court to dismiss the third-party claim against Ivy and the related affirmative defense, which includes liability based upon Ivy’s legal duty to protect Alexis. As the Plaintiffs do not seriously contend that Ivy had no duty of care to her minor daughter, Religious Defendants note for the Court that, to the extent the Plaintiffs’ Motion seeks to dismiss the claims against Ivy relating to Alexis, it has not been argued by Plaintiffs and dismissing Ivy as a third party as to her duty to protect Alexis is not proper.

As to the duty Ivy owed to Holly, Plaintiffs ignore the fact that Ivy had temporary custody over Holly at those times that Holly, a minor, was living in her home in Nebraska where she was abused by Marco. Additionally, if it is proven that Ivy took Holly to Don Herberger’s home in 1998 when she claims she attempted to get Holly help and stop abuse by Reyes, then she also had temporary custody and control over Holly on that occasion.

Ivy entered into a special relationship of custody and control with Holly and stood in *loco parentis* on various occasions. She invited Holly, a minor, to her home in Plains

and to her home in Nebraska, and in both locations, Marco abused Holly. Additionally, in relation to the abuse by Max, Ivy alleges she acted affirmatively with the intent of helping Holly stop further abuse by Reyes by talking Don Herberger, whom she mistakenly believed was a congregation elder in 1998. Because she took action, Ivy was required to act reasonably in her efforts to protect Holly. *Nelson v. Driscoll*, 1999 MT 193, ¶ 37, 295 Mont. 363, 983 P.2d 972 (“[T]he long-standing principle of tort law [is] that ‘one who assumes to act, even though gratuitously, may thereby become subject to the duty of acting carefully, if he acts at all.’” (Citation omitted.)).

Rather than protecting Holly, after she had voluntarily undertaken the effort to provide protection, Ivy knowingly put Holly at risk when she returned Holly to Reyes’s home without reporting abuse to the police—thereby making her sister available to Reyes for further abuse—and when she invited Holly to live with her in Nebraska where a registered sex offender lived in the house—thereby making her sister available to Nunez for further abuse. Indeed, in both instances, Ivy’s actions facilitated further abuse by Reyes and by Nunez.

**C. If the Defendants Are Found to Be Negligent, Ivy’s Negligence Must Be Compared with the Defendants’ Negligence.**

Plaintiffs argue that because Marco Nunez’s actions were not part of the same transactions or occurrences that are the basis for these claims, the damages Marco Nunez caused are different than the damages Max Reyes caused, and neither Max nor Marco are proper parties. Pls.’ Mot. Partial Summ. J. Defs.’ 3rd-Party Claims Ivy McGowan-Castleberry at 6, June 26, 2018. Thus, “for the same reasons” Plaintiffs contend that any

damage Ivy caused is different than the damage Nunez or Reyes caused.

There are two problems with Plaintiffs' position. First, Plaintiffs ignore the fact that Ivy voluntarily undertook a duty to protect Holly by entering into a special relationship with Holly on occasions when she took custody and control over Holly, such as when she took Holly to Mr. Herberger's home and when Holly moved into Ivy's home. At those times, Ivy was a temporary custodian, with the obligations to protect Holly from foreseeable harm.

Second, the Plaintiffs' argument ignores the fact that Plaintiffs' "damages" and "injuries" stem from *all* the acts of child abuse they suffered, and thus the cause of the damages is divided between multiple parties. The damages each Plaintiff suffered from child abuse by Reyes are not capable of quantification or separation from the damages they suffered from child abuse by Nunez. The damages are too similar in nature and too intermingled. But Ivy was in a unique position to prevent all such abuse and she undertook a legal duty to protect Holly. Rather than protecting Holly, Ivy negligently gave Nunez and Reyes access to Holly and facilitated further abuse.

Thus, as Montana Code Annotated § 27-1-703 acknowledges, a defendant may file third party actions against those whose negligence (negligence to any degree) has contributed to the *damages a plaintiff seeks to collect from that defendant*. Specifically, § 27-1-703(4) says "[O]n motion of a party against whom a claim is asserted for negligence resulting in . . . injury . . . , **any other person whose negligence may have contributed as a proximate cause to the injury complained of** may be joined as an additional party to the action." (Emphasis added.)



Plaintiffs argue that the damages they suffer resulting from the abuse by Marco Nunez are not the subject of the lawsuit, and thus not appropriately considered by the jury. However, the abuse inflicted by Marco—which for both Plaintiffs predated the abuse by Max—is inextricably linked to the damages they claim in this case. Plaintiffs ignore the fact that they want the Religious Defendants to compensate them for *all* damages that they suffer from *all* the abuse done to them by *several different abusers*. The statute does not limit those against whom a defendant may bring a claim to only the people plaintiff has sued, nor does it limit third-party defendants to only those who were involved in a *specific act of abuse*.

The damages sought by Plaintiffs include: emotional scars and post-traumatic stress disorder, mental anguish, mental impairment/disfigurement, psychological pain, and loss of enjoyment and quality of life. 1st Am. Compl. ¶¶ 42-43, Prayer ¶ 1(c)-(j), Nov. 14, 2016 (“Compl.”). Throughout their Complaint, Plaintiffs complain about childhood sexual abuse. *See, e.g.*, Compl. ¶¶ 38-39, 41, 47(c)-(h), 52 & 64.

Because of the years of abuse by multiple perpetrators, it is difficult to determine when Plaintiffs began to suffer the emotional damages they seek compensation for in this lawsuit. Alan W. Newman, M.D., F.A.P.A., Board Certified in Psychiatry and in Forensic Psychiatry, explained in his reports on Plaintiffs the details of their damages, and the causes of those damages. As Dr. Newman stated in a May 21, 2018 report, Holly suffers from Post-Traumatic Stress Disorder (PTSD):

Due to the number of abusers and cumulative traumatic experiences going back to her childhood, I am unable to precisely determine when Holly would have first met criteria for this disorder. . . . It is my opinion that no

single event or alleged perpetrator was solely responsible for her posttraumatic stress symptoms. Marco Nunez, Max Reyes, and the unnamed friend of Max Reyes all engaged in prolonged sexual abuse of Holly. Both the abuse by Nunez and Reyes involved multiple acts over multiple years, including the initial penetration and forced oral sex. Both the abuse by Nunez and Reyes included an attempt at forced intercourse.

8th Found. Aff. Kathleen L. DeSoto ¶ 4, July 13, 2018 (“8th Aff. DeSoto”),

Ex. B-6.

The “injury complained of” is a complex set of physical and emotional damages that were caused by multiple abusers. Most of the abuse was done by Nunez and Reyes, both of whom are liable to Plaintiff Holly McGowan for the injuries she complains of in this lawsuit. Ivy knew of both the abuse by Max and the abuse by Marco, yet she let both men have access to her sister Holly and her daughter Alexis at times when Ivy had a legal duty to protect them. Thus, Ivy facilitated Holly’s abuse by both Reyes and Nunez and contributed to Holly’s damages. Ivy is a proper third-party defendant.

Ivy is also liable for Alexis’s damages. Like Holly, Alexis suffers PTSD. Again, because of her several abusers, Dr. Newman was “unable to determine when Alexis first met criteria for this disorder precisely.” 8th Aff. DeSoto ¶ 3, Ex. A-8. She suffers from abuse by three men, two of whom Religious Defendants have sued as third-party defendants in this lawsuit. Ivy contributed to Alexis’s injuries because she delivered Alexis to the men who abused her even though she knew both Marco and Max had molested her sister Holly.

**D. Divisibility of Damages vs. Proof of Causation.**

Defendants’ proof shows that the damages the Plaintiffs suffer stem from abuse by

several different men, all of which Ivy undertook a legal duty to prevent when the Plaintiffs were in her care. Defendants are thus not seeking to apportion damages based upon their divisibility and ability to be apportioned. *See Truman v. Mont. 11th Jud. Dist. Ct.*, 2003 MT 91, ¶ 25, 315 Mont. 165, 68 P.3d 654. Rather, as in *Clark v. Bell*, 2009 MT 390, 353 Mont. 331, 220 P.3d 650, the Religious Defendants seek to implead those whose conduct is a substantial contributing factor, on the issue of causation—to show that any negligence by the Religious Defendants is not the cause or the sole cause of Plaintiffs’ injuries. The Court noted:

*Truman* did not disturb the basic right to challenge causation, here, by testing the opinions of the plaintiff’s experts by reference to relevant evidence on cross-examination. *Truman* affirmed that “a defendant is permitted to submit relevant evidence of subsequent accidents to negate allegations that he is the cause or sole cause of an injury.”

*Clark*, ¶ 23 (quoting *Truman*, ¶ 31). In *Clark*, the Court permitted evidence that the actions of the defendant were not the cause of the plaintiff’s damages, and the Montana Supreme Court noted that the issue of causation properly went to the jury. *Clark*, ¶ 27.

In this case, Religious Defendants seek to have the alleged causes of Plaintiffs’ damages joined in one action, demonstrate the relative percent of cause of damages done by each person, and improve the chance that a jury will only ascribe to the Religious Defendants the share (if any) that actually resulted from their actions and not hold these Defendants liable for *all* of Plaintiffs’ damages from child abuse that were caused by the actions or failure to take action of others who could have prevented the molestation. This is appropriate under the holdings of *Truman* and *Clark*.

### E. Contribution.

Montana Code Annotated § 27-1-703(1) allows contribution based on the combined conduct of multiple tortfeasors. As Religious Defendants have shown in another response, the statute permits comparison of parties whose conduct involves different degrees of culpability.

In 1997, the Montana Legislature adopted Montana Code Annotated § 27-1-703(1) (1997) (Temporary),<sup>2</sup> which allows a “right of contribution from any other person whose negligence may have contributed as a proximate cause to the injury complained of.”

Montana Code Annotated § 27-1-705(1) (1997) (Temporary) explains: “The purpose of 27-1-703 and this section is to substitute several liability for the former law providing for joint and several liability . . . The purpose of several liability is to allocate responsibility based on fault to all parties to an occurrence, rather than only to the parties to the litigation, and to ensure that the liability of each party to an occurrence is allocated in direct proportion to that party’s fault.”<sup>3</sup> Subsection (9) explains: “For purposes of this

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<sup>2</sup>The 1997 temporary statute resolved the nonparty substantive due process issues raised in *Plumb v. Fourth Jud. Dist. Ct.*, 279 Mont. 363, 927 P.2d 1011 (1996) by removing the ability of a defendant to assign liability for a plaintiff’s damages to a third party without giving that third party the opportunity to defend himself. If a defendant pleads the fault of another person, including a settled or released person, that person may intervene in the action to defend against the claims (the settled or released person would do so to protect his reputation, e.g.). Mont. Code Ann. § 27-1-703(6)(f). But if a settling or released nonparty chooses not to appear, then the plaintiff could find him or herself faced with a disproportionate assignment of liability to the unnamed, unrepresented, nonparticipating third person—one of the ills that *Plumb* held unconstitutional. *Plumb*, 927 P.2d at 1020.

<sup>3</sup> The word “occurrence” does not appear to be defined in the statutory scheme. However, the term has a broader meaning than words like “incident” or “accident.” In connection with the Plaintiffs’ allegations of harm caused by child sexual abuse, all of

section, ‘fault’ means an **act or omission that proximately caused or contributed to injury or damages** sustained by a person seeking recovery **and includes negligence in any of its degrees . . . .**” Mont. Code Ann. § 27-1-705(9) (1997) (emphasis added).

In this case, Plaintiffs are seeking substantial damages resulting from years of abuse. The jury must decide who caused those damages, and should be able to consider the conduct of the actual abusers—Max and Marco—as well as the conduct of Ivy McGowan-Castleberry and the Religious Defendants. Preventing allocation of liability to *all* co-tortfeasors would (1) violate the Defendants’ substantive due process rights, (2) prevent reduction of liability based upon the actions of a negligent (or worse) nonparty and (3) require the Defendants to assume the liability of others who caused the damages.

**F. Indemnification.**

Defendants seek equitable indemnity. *Durden v. Hydro Flame Corp.*, 1999 MT 186, ¶¶ 12, 25-26, 295 Mont. 318, 983 P.2d 943 (“Indemnity . . . shifts the entire loss from the one who has been required to pay it to the one who should bear the loss . . . . The right to indemnity is an equitable principle, based on the general theory that one compelled to pay for damages caused by another should be able to seek recovery from that party.”).

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which occurred within the family circle, the jury must be allowed to consider how these Plaintiffs were exposed to sexual abuse by various family members, when information was circulated within that family circle about the danger and when similar acts committed over time contributed to a common injury. Ongoing incest within a family meets the broad definition of “occurrence” and all persons who contributed to the Plaintiffs’ psychological injury should be included in the determination of causation for those injuries.

Religious Defendants seek to shift any losses ascribed to them to those persons who actively and actually harmed the Plaintiffs. The abuse did not happen in connection with religious activities sponsored by the Religious Defendants. It happened in private homes owned by members of Plaintiffs' families and elsewhere, and Ivy knew that both abusers had done it before. Defendants' liability for alleged passive negligence stems from Max's and Marco's willful molestation of Plaintiffs and from Ivy's making Plaintiffs available to their abusers when she knew the danger they posed. The Religious Defendants' claim for equitable indemnity is thus supported by Plaintiffs' First Amended Complaint and the law.

Under the present common-law indemnity scheme in Montana, Defendants have the right to sue those whose failure to act or whose active fault has caused some part of the Plaintiffs' injuries and/or has resulted in Defendants' alleged liability. For that reason, the Religious Defendants urge the Court to permit them to proceed to seek apportionment, contribution and indemnity against the Third-Party Defendants.

## I. CONCLUSION

In 2001, Ivy McGowan-Castleberry knew that Marco abused children, yet allowed Holly to stay in her home, where she was subjected to continued abuse by Marco. In 1998, she learned that Max Reyes had abused Holly, yet she later let her young daughter Alexis stay overnight in the very same home where Max had abused Holly, and he subsequently abused Alexis. Ivy had affirmatively undertaken actions to protect Holly, and thus assumed a duty of care to her sister. It is undisputed that Ivy had a duty to protect her own young daughter. Because there are issues of fact whether Ivy violated

her duty to both Holly and Alexis and was part of the cause of their damages, Plaintiffs' Motion for Partial Summary Judgment as to claims against Ivy McGowan-Castleberry should be denied.

DATED this 20<sup>th</sup> day of July, 2018.

Attorneys for Religious Defendants/Third-Party Plaintiffs:

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By Kathleen L. DeSoto  
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## CERTIFICATE OF SERVICE

I hereby certify that on July 20, 2018, a copy of the foregoing document was served on the following persons by the following means:

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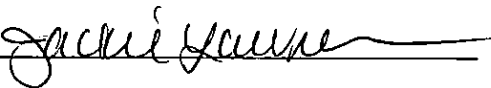
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