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SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

AUG 15 2016

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

AUG 15 2016 SS
S. Sterling

RS
AUG 18 2016

Address of surety for service under CCP § 995.320:

485 Lexington Avenue, New York, NY 10017

Bond Number: 106546610

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE**

JW, Individually, by and through her Guardian Ad Litem, TW,

Plaintiff(s),

vs.

Mountain View Congregation of Jehovah's Witnesses, Murrieta California; French Valley Congregation of Jehovah's Witnesses, Murrieta, California, Inc.; Watchtower Bible and Tract Society of New York, Inc.; Christian Congregation of Jehovah's Witnesses, Inc.; and Does 1 through 100, inclusive,

Defendant(s).

Case No.: MCC-1300850

UNDERTAKING ON APPEAL

WHEREAS, Defendant Watchtower Bible and Tract Society of New York, Inc. (the "Bonded Defendant"), desires to give an undertaking for appeal pursuant to Code of Civil Procedure section 917.1 from the judgment entered in the above-referenced case on July 15, 2016,

NOW, THEREFORE, KNOW ALL MEN BY THESE PRESENTS, that the Bonded Defendant, as Principal, and TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA, a corporation authorized to transact surety insurance business in the State of California, as Surety, are held and firmly bound onto JW, Individually by and through her Guardian Ad Litem, TW, as Obligee, in the maximum aggregate sum of six million, twenty-four thousand, two hundred and twenty-eight and 58/100 Dollars (\$6,024,228.58) representing one and one-half times the amount of the judgment pursuant to Code of Civil Procedure section 917.1 subd. (b), for the

payment of which, well and truly to be made, we bind ourselves, our successors and assigns, jointly and severally, firmly by these presents; provided, however, the maximum liability of the Surety hereunder shall not exceed the maximum aggregate sum set forth herein.

FURTHERMORE, the above obligation is to be void, otherwise to remain in full force and effect, if: (a) pursuant to Code of Civil Procedure section 917.1 subd. (b); the judgment or order or any part of it is affirmed or the appeal is withdrawn or dismissed and the Bonded Defendant shall pay the amount of the judgment or order, or the part of it as to which the judgment or order is affirmed, as entered after the receipt of the remittitur, together with any interest which may have accrued pending the appeal and entry of the remittitur, and costs which may be awarded against the appellant on appeal; or (b) the judgment is reversed or vacated in its entirety.

IN TESTIMONY WHEREOF, the undersigned has caused its corporate name and seal to be hereunto affixed by its duly authorized officer at 10 State House Square, 11th Floor, Hartford, CT 06103 on this 12th day of August, 2016.

This bond is executed under penalty of perjury under California law on this 12th day of August, 2016, at 10 State House Square, 11th Floor, Hartford, CT 06103, by the undersigned, who declares that she is a duly authorized Attorney-in-Fact for said surety acting under the attached unrevoked power of attorney.

DATED: August 12, 2016

TRAVELERS CASUALTY AND SURETY COMPANY
OF AMERICA



Aimee Perondine, ATTORNEY-IN-FACT

ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of ~~California~~ ^{Connecticut}
County of Hartford

On August 12, 2016 before me, Kimberly M. Kidd; Notary Public
(insert name and title of the officer)

personally appeared Aimee Perondine
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature  (Seal)

Kimberly M. Kidd

State of Connecticut

Commission Expires May 31, 2017



POWER OF ATTORNEY

Farmington Casualty Company
Fidelity and Guaranty Insurance Company
Fidelity and Guaranty Insurance Underwriters, Inc.
St. Paul Fire and Marine Insurance Company
St. Paul Guardian Insurance Company

St. Paul Mercury Insurance Company
Travelers Casualty and Surety Company
Travelers Casualty and Surety Company of America
United States Fidelity and Guaranty Company

Attorney-In Fact No. 230424

Certificate No. 006650464

KNOW ALL MEN BY THESE PRESENTS: That Farmington Casualty Company, St. Paul Fire and Marine Insurance Company, St. Paul Guardian Insurance Company, St. Paul Mercury Insurance Company, Travelers Casualty and Surety Company, Travelers Casualty and Surety Company of America, and United States Fidelity and Guaranty Company are corporations duly organized under the laws of the State of Connecticut, that Fidelity and Guaranty Insurance Company is a corporation duly organized under the laws of the State of Iowa, and that Fidelity and Guaranty Insurance Underwriters, Inc., is a corporation duly organized under the laws of the State of Wisconsin (herein collectively called the "Companies"), and that the Companies do hereby make, constitute and appoint

Jeannette Porrini, Stacy Rivera, Aiza Lopez, Erin L. Kiernan, Aimee Perondine, and Jennifer Garten

of the City of Hartford, State of Connecticut, their true and lawful Attorney(s)-in-Fact, each in their separate capacity if more than one is named above, to sign, execute, seal and acknowledge any and all bonds, recognizances, conditional undertakings and other writings obligatory in the nature thereof on behalf of the Companies in their business of guaranteeing the fidelity of persons, guaranteeing the performance of contracts and executing or guaranteeing bonds and undertakings required or permitted in any actions or proceedings allowed by law.

IN WITNESS WHEREOF, the Companies have caused this instrument to be signed and their corporate seals to be hereto affixed, this 3rd day of February, 2016

Farmington Casualty Company
Fidelity and Guaranty Insurance Company
Fidelity and Guaranty Insurance Underwriters, Inc.
St. Paul Fire and Marine Insurance Company
St. Paul Guardian Insurance Company

St. Paul Mercury Insurance Company
Travelers Casualty and Surety Company
Travelers Casualty and Surety Company of America
United States Fidelity and Guaranty Company



State of Connecticut
City of Hartford ss.

By: [Signature]
Robert L. Raney, Senior Vice President

On this the 3rd day of February, 2016, before me personally appeared Robert L. Raney, who acknowledged himself to be the Senior Vice President of Farmington Casualty Company, Fidelity and Guaranty Insurance Company, Fidelity and Guaranty Insurance Underwriters, Inc., St. Paul Fire and Marine Insurance Company, St. Paul Guardian Insurance Company, St. Paul Mercury Insurance Company, Travelers Casualty and Surety Company, Travelers Casualty and Surety Company of America, and United States Fidelity and Guaranty Company, and that he, as such, being authorized so to do, executed the foregoing instrument for the purposes therein contained by signing on behalf of the corporations by himself as a duly authorized officer.

In Witness Whereof, I hereunto set my hand and official seal.
My Commission expires the 30th day of June, 2016.



[Signature]
Marie C. Tetreault, Notary Public

WARNING: THIS POWER OF ATTORNEY IS INVALID WITHOUT THE RED BORDER

This Power of Attorney is granted under and by the authority of the following resolutions adopted by the Boards of Directors of Farmington Casualty Company, Fidelity and Guaranty Insurance Company, Fidelity and Guaranty Insurance Underwriters, Inc., St. Paul Fire and Marine Insurance Company, St. Paul Guardian Insurance Company, St. Paul Mercury Insurance Company, Travelers Casualty and Surety Company, Travelers Casualty and Surety Company of America, and United States Fidelity and Guaranty Company, which resolutions are now in full force and effect, reading as follows:

RESOLVED, that the Chairman, the President, any Vice Chairman, any Executive Vice President, any Senior Vice President, any Vice President, any Second Vice President, the Treasurer, any Assistant Treasurer, the Corporate Secretary or any Assistant Secretary may appoint Attorneys-in-Fact and Agents to act for and on behalf of the Company and may give such appointee such authority as his or her certificate of authority may prescribe to sign with the Company's name and seal with the Company's seal bonds, recognizances, contracts of indemnity, and other writings obligatory in the nature of a bond, recognizance, or conditional undertaking, and any of said officers or the Board of Directors at any time may remove any such appointee and revoke the power given him or her; and it is

FURTHER RESOLVED, that the Chairman, the President, any Vice Chairman, any Executive Vice President, any Senior Vice President or any Vice President may delegate all or any part of the foregoing authority to one or more officers or employees of this Company, provided that each such delegation is in writing and a copy thereof is filed in the office of the Secretary; and it is

FURTHER RESOLVED, that any bond, recognizance, contract of indemnity, or writing obligatory in the nature of a bond, recognizance, or conditional undertaking shall be valid and binding upon the Company when (a) signed by the President, any Vice Chairman, any Executive Vice President, any Senior Vice President or any Vice President, any Second Vice President, the Treasurer, any Assistant Treasurer, the Corporate Secretary or any Assistant Secretary and duly attested and sealed with the Company's seal by a Secretary or Assistant Secretary; or (b) duly executed (under seal, if required) by one or more Attorneys-in-Fact and Agents pursuant to the power prescribed in his or her certificate or their certificates of authority or by one or more Company officers pursuant to a written delegation of authority; and it is

FURTHER RESOLVED, that the signature of each of the following officers: President, any Executive Vice President, any Senior Vice President, any Vice President, any Assistant Vice President, any Secretary, any Assistant Secretary, and the seal of the Company may be affixed by facsimile to any Power of Attorney or to any certificate relating thereto appointing Resident Vice Presidents, Resident Assistant Secretaries or Attorneys-in-Fact for purposes only of executing and attesting bonds and undertakings and other writings obligatory in the nature thereof, and any such Power of Attorney or certificate bearing such facsimile signature or facsimile seal shall be valid and binding upon the Company and any such power so executed and certified by such facsimile signature and facsimile seal shall be valid and binding on the Company in the future with respect to any bond or understanding to which it is attached.

I, Kevin E. Hughes, the undersigned, Assistant Secretary, of Farmington Casualty Company, Fidelity and Guaranty Insurance Company, Fidelity and Guaranty Insurance Underwriters, Inc., St. Paul Fire and Marine Insurance Company, St. Paul Guardian Insurance Company, St. Paul Mercury Insurance Company, Travelers Casualty and Surety Company, Travelers Casualty and Surety Company of America, and United States Fidelity and Guaranty Company do hereby certify that the above and foregoing is a true and correct copy of the Power of Attorney executed by said Companies, which is in full force and effect and has not been revoked.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seals of said Companies this 12th day of August, 20 16.


Kevin E. Hughes, Assistant Secretary



To verify the authenticity of this Power of Attorney, call 1-800-421-3880 or contact us at www.travelersbond.com. Please refer to the Attorney-In-Fact number, the above-named individuals and the details of the bond to which the power is attached.

1 **PROOF OF SERVICE**

2 *JW v. Mountain View Congregation of Jehovah's Witnesses, et al.*
3 *Riverside County Superior Court Case No. MCC 1300850*

4 I am employed in Los Angeles County. I am over the age of 18 and not a party to this action.
5 My business address is 1055 West Seventh Street, 24th Floor, Los Angeles, California 90017.

6 On August 15, 2016, I served the foregoing document, described as follows:
7 "UNDERTAKING ON APPEAL" in this action by placing

8 the original of the document true copies of the document

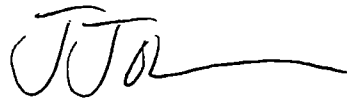
9 in separate sealed envelopes to the following addresses:

10 **SEE ATTACHED LIST**

11 **BY U.S. MAIL** I deposited such envelope in the mail at Los Angeles, California. The envelopes
12 were mailed with postage thereon fully prepaid. I am readily familiar with Morris Polich & Purdy's
13 practice of collection and processing correspondence for mailing. Under that practice, documents are
14 deposited with the U.S. Postal Service on the same day that is stated in the proof of service, with
15 postage fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on
16 motion of party served, service is presumed invalid if the postal cancellation date or postage meter date
17 is more than one day after the date stated in this proof of service.

18 **STATE** I declare under penalty of perjury under the laws of the state of California, that the above
19 is true and correct.

20 Executed on August 15, 2016, at Los Angeles, California.

21 

22 _____
23 J. Johnson
24
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SERVICE LIST

*JW v. Mountain View Congregation of Jehovah's Witnesses, et al.
Riverside County Superior Court Case No. MCC 1300850*

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