

PETITIONER'S MOTION TO DEEM SERVICE EFFECTIVE OR AUTHORIZE ALTERNATIVE SERVICE

Jorden Hollingsworth
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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

JORDEN HOLLINGSWORTH,

Case No. 3:25-cv-01342-AB

Petitioner,

v.

SANOFI-AVENTIS US; CHATTEM INC.;
QUTEN RESEARCH INSTITUTE LLC; AMJ
SERVICES LLC; DRVM LLC; DEEPAK
CHOPRA; MAGED BOUTROS; ASHRAF
BOUTROS; MARIE-LAURIE AMIARD-
BOUTROS,

Respondents.

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ALTERNATIVE SERVICE

Petitioner Jorden Hollingsworth, pro se, respectfully moves this Court for an order pursuant to Fed. R. Civ. P. 4(e)(1), 4(h)(1), and 4(m): (1) deeming service effective on Respondents Sanofi-Aventis U.S. LLC and Chattem Inc.; or (2) authorizing alternative service of process.

I. BACKGROUND

1. On July 31, 2025, Petitioner filed a Petition to Compel Arbitrator Appointment under 9 U.S.C. § 5 (*ECF No. 2*).

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2. The U.S. Marshals attempted service on Respondents Sanofi-Aventis U.S. LLC and Chattem Inc. at their Bridgewater, NJ corporate headquarters. Both attempts were unsuccessful (*ECF No. 20, 21*).

3. By contrast, Respondent Quten Research Institute LLC, a subsidiary within the same corporate structure, was successfully served at its registered address on September 10, 2025 (*ECF No. 19*).

4. The Marshal's return for Sanofi and Chattem documents three separate attempts at the headquarters:

- **September 5, 2025**
- **September 12, 2025 (Morning)**
- **September 12, 2025 (Afternoon)**

5. These headquarters addresses are correct and effective for service. Both Sanofi and Chattem accepted certified mailings there during arbitration, and JAMS arbitrator disclosures (*Ex. 31*) list these same addresses as official corporate contact points.

6. Petitioner's service list from arbitration likewise confirms that service was completed and accepted at these headquarters addresses (*Ex. 32*).

7. State filings further confirm that Chattem, Inc. lists its principal and mailing office at 55 Corporate Dr, Bridgewater, NJ, the same headquarters address where the Marshals attempted service (*Ex. B*). This reinforces that the addresses used are proper corporate service points, consistent with prior arbitration mailings and JAMS disclosures.

II. SERVICE EFFORTS AND RELATED CONTEXT

8. The U.S. Marshals made multiple documented attempts at Sanofi's headquarters, confirming diligence in pursuing service through proper channels.

9. Sanofi and Chattem have previously accepted service at these same headquarters addresses in arbitration, demonstrating that the addresses are valid and effective.

10. In addition, counsel for co-respondent DRVM LLC (Fisher & Phillips LLP) engaged in an ex parte communication with Court staff to inquire whether any Respondent was required to file an Answer. The Court directed that all communications must be filed on the docket (*Ex. A*), and later ordered that all Respondents must answer before DRVM could provide any further pleading (*ECF No. 14*).

11. This conduct underscores a consistent strategy: avoid answering on the merits. The same pattern appeared in arbitration, where respondents delayed despite having accepted service at their own headquarters.

III. LEGAL STANDARD

12. Rule 4(e)(1): Service may be effected by following state law or federal rules.

13. Rule 4(h)(1): Corporations may be served by following Rule 4(e)(1) or by delivering process to an officer, managing agent, or other agent authorized by law.

14. Rule 4(m): If service is not completed within 90 days, the Court may extend the deadline or authorize alternative service when the plaintiff has been diligent.

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Courts consistently hold that unsuccessful attempts at valid addresses, together with evidence of actual notice, justify either deeming service effective or permitting alternate methods. *Nikwei v. Ross Sch. of Aviation, Inc.*, 822 F.2d 939, 941–42 (10th Cir. 1987); *Gambone v. Lite-Rock Drywall*, 288 F.R.D. 88, 90 (E.D. Pa. 2012).

IV. RELIEF REQUESTED

For the reasons stated, Petitioner respectfully requests that the Court:

1. Deem service effective on Sanofi-Aventis U.S. LLC and Chattem Inc., based on the Marshal's diligent attempts and Respondents' prior acceptance of service at these headquarters addresses; or

2. Authorize alternate service under Fed. R. Civ. P. 4(e)(1), 4(h)(1), and 4(m), including one or more of the following:

- Certified mail to their headquarters;
- Electronic service (email or website of record);
- Service on counsel already appearing;
- Service through the Secretaries of State; or
- Publication in a newspaper of general circulation.

V. CONCLUSION

Petitioner has pursued service diligently. The Marshals' documented attempts, Respondents' prior use of these headquarters addresses, their own disclosures, and Chattem's official state filings (*Ex. B*) all demonstrate that Respondents have actual notice of the

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proceedings. Exhibit A illustrates an effort to avoid answering through ex parte contact, which the Court already corrected.

Respondents' actions mirror the same tactics of delay and obstruction that were present in arbitration, underscoring why intervention is necessary. To prevent further delay, Petitioner respectfully requests that the Court deem service effective or authorize an appropriate alternative method.

Respectfully submitted,

Date: September 17, 2025

Jorden Hollingsworth
Pro Se Petitioner

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