

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.

**NOTICE OF SUPPLEMENTAL AUTHORITY — SANOFI LITIGATION AND IRS/SEC
NON-DISCLOSURE IN OCTOBER 2025 FORM 6-K**

Plaintiff Jorden Hollingsworth, appearing pro se, respectfully submits this Notice of Supplemental Authority relevant to the motions presently under consideration, including: (1) Motion to Deem Service Effective or Alternative Service, (2) Motion to Correct the Docket as to DRVM LLC, (3) five entries of default, and (4) Defendant Chopra’s Motion to Dismiss and Plaintiff’s Sur-Reply.

The omission of this ongoing federal litigation from a mandatory SEC disclosure is a serious matter. Sanofi’s failure to reference active U.S. proceedings, whistleblower filings, and federal motions in its October 27, 2025 Form 6-K demonstrates that defendants’ evasion extends

beyond this Court. It reflects a broader pattern of nondisclosure that misleads regulators and investors while undermining the integrity of these proceedings. This pattern reinforces the record already before the Court showing that defendants are not merely avoiding service, but actively concealing their exposure across multiple jurisdictions.

1. New SEC Filing by Sanofi

On October 27, 2025, Defendant Sanofi-Aventis S.A. furnished to the U.S. Securities and Exchange Commission a Form 6-K (Exhibit 99.1) — a fifty-eight-page half-year financial report covering events after June 30, 2025. That is attached as Exhibit A.

Although Section C (“Events Subsequent to June 30, 2025”) appears in the table of contents, pages 43-45, Section B. 14, Page 58, contains no reference to:

- this federal action (Hollingsworth v. Sanofi-Aventis U.S. et al.),
- Plaintiff’s \$15 billion IRS whistleblower claim and active IRS audit,
- the arbitration proceedings in which Sanofi and its subsidiaries have been named since March 4, 2025, or
- the five defaults presently before this Court.

Because this case and related whistleblower filings were public and material to U.S. operations, the omission appears relevant under Rule 10b-5 and Form 6-K Item 5 (“otherwise material information”).

2. Procedural Context

Plaintiff filed the initial whistleblower submission with the SEC in April 2025 and received an official submission number. The undersigned intends to supplement that filing with this new 6-K to document Sanofi’s omission of ongoing U.S. litigation.

Plaintiff has named Sanofi and its subsidiaries in arbitration since March 4, 2025. Following removal to federal court on July 31, 2025, the U.S. Marshals Service made three unsuccessful service attempts due to defendants’ evasion but achieved successful service on Quten Research Institute, an entity wholly owned and controlled by Sanofi.

3. Purpose of This Notice

This 6-K filing constitutes newly available, publicly filed evidence of defendants’ continuing nondisclosure and is submitted solely to assist the Court in evaluating the pending motions concerning bad-faith evasion, alternative service, and default.

The omission of this federal action from a mandatory Form 6-K report filed after the case commenced constitutes a material non-disclosure under the standards of Rule 10b-5. This development adds significant weight to Plaintiff’s evidence of deliberate concealment and bad-faith conduct before this Court.

A true and correct copy of Sanofi Form 6-K (EX-99.1), filed October 27, 2025, is attached as Exhibit A.

Exhibit B includes excerpts from Sanofi’s related filing (Exhibit 99.2) showing that defendants disclosed other active investigations by the DOJ, HHS, and FDA while omitting this federal case and the IRS whistleblower matter.

Respectfully submitted,

Dated: October 29, 2025

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