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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

JORDEN HOLLINGSWORTH,

Plaintiff,

Case No. 3:25-cv-2308-SB

v.

SANOFI-AVENTIS US LLC; CHATTEM INC.;
QUTEN RESEARCH INSTITUTE LLC; AMJ
SERVICES LLC; STEVEN S. DICKERT, in his capacity as Trustee of BASIL
MANAGEMENT TRUST
Defendants.

**DECLARATION OF JORDEN HOLLINGSWORTH IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO DEFENDANTS' MOTIONS TO DISMISS**

I, Jorden Hollingsworth, declare as follows:

1. I am the Plaintiff in this action and make this declaration in support of Plaintiff's Opposition to Defendants' Motions to Dismiss. I have personal knowledge of the facts stated herein and, if called as a witness, could and would testify competently to them.
2. The exhibits attached to this declaration consist of public business registry records, corporate filings, website captures, correspondence, arbitration documents, financial records, and other materials referenced in Plaintiff's Opposition.
3. Some exhibits consist of publicly available business registry records and website materials obtained from official state or corporate sources. Exhibits 23–26 consist of screenshots of publicly available LinkedIn profiles captured by Plaintiff.

4. The exhibits are labeled sequentially as Exhibits 1 through 34. The documents attached are true and correct copies of the materials described below.

EXHIBIT INDEX

- I. SANOFI-RELATED ENTITIES AND TRANSFERS
- Exhibit 1 – MK WW Enterprises LLC
 - Exhibit 2 – MAK Media LLC
 - Exhibit 3 – MAK Nutrition LLC
 - Exhibit 4 – MAK Digital LLC
 - Exhibit 5 – QNB LLC
 - Exhibit 6 – QNBH Enterprises LLC
 - Exhibit 7 – QPD IP LLC
 - Exhibit 8 – QUCOM LLC
 - Exhibit 9 – TPD IP LLC
- II. ENTITIES CONNECTED TO ASHRAF BOUTROS AND VITAMINA LABS
- Exhibit 10 – VitaMina Labs LLC
 - Exhibit 11 – MK Marketing LLC
- III. ENTITIES CONNECTED TO STEVEN S. DICKERT
- Exhibit 12 – Vitacom LLC
 - Exhibit 13 – Zena Nutrition LLC
 - Exhibit 14 – FC Nevada Inc.
 - Exhibit 15 – FTN Marketing LLC
- IV. DRVM LLC AND RELATED STATE FILINGS
- Exhibit 16 – Idaho Secretary of State filing for DRVM LLC dated January 13, 2025

V. AMJ SERVICES LLC – ADDRESS CHANGES

- Exhibit 17 – Nevada Secretary of State filing showing AMJ Services LLC address change
- Exhibit 18 – Oregon Secretary of State filing showing AMJ Services LLC registration

VI. ADDITIONAL WORKFORCE ENTITIES

- Exhibit 19 – DRC Demo LLC
- Exhibit 20 – DRVM LLC Oregon

VII. WITNESS DECLARATIONS AND THIRD-PARTY DOCUMENTS

- Exhibit 21 – Declaration of Stacey Nelson
- Exhibit 22 – Cease and desist letter issued to Stacey Nelson by GRSM dated May 14, 2025

VIII. REGISTERED AGENT AND INDIVIDUAL CONNECTIONS

- Exhibit 23 – Vilma Veras LinkedIn profile
- Exhibit 24 – Shiela Klein address and LinkedIn profile

IX. PRODUCT LINE AND BRAND DOCUMENTATION

- Exhibit 25 – Zena Nutrition website screenshots

X. INDIVIDUAL EXECUTIVE CONNECTIONS

- Exhibit 26 – Maged Boutros LinkedIn profile

XI. ARBITRATION PROCEEDINGS AND QUALIFICATIONS

- Exhibit 27 – JAMS arbitration scheduling order reflecting February 19, 2025 arbitration demand
- Exhibit 28 – Fisher Phillips/DRVM agreement regarding arbitrator qualifications (Highlighted)
- Exhibit 29 – JAMS email regarding dual representation of DRVM

XII. PAYMENT AND PRESERVATION EVIDENCE

- Exhibit 30 – Bank record reflecting \$6,130.10 deposit dated July 1, 2025

- Exhibit 31 – Preservation letter sent to Fisher Phillips dated January 30, 2026

XIII. SERVICE ATTEMPTS ON SANOFI DEFENDANTS

- Exhibit 32 – U.S. Marshals Service return showing unsuccessful service attempts at Sanofi headquarters for Sanofi & Chattem Inc

XIV. ARBITRATION DISCOVERY RESPONSES

- Exhibit 33 – DRVM LLC arbitration discovery responses dated February 26, 2026

XV. SANOFI PRESS RELEASE OF ACQUISITION OF QUTEN RESEARCH INSTITUTE

- Exhibit 34 – Sanofi press release (Highlighted)

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on March 4th, 2026.

/s/ Jordan Hollingsworth
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Plaintiff – Pro Se
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