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7 *Attorney for Plaintiffs True Names, Ltd. and Virgil Griffith*

8 **IN THE UNITED STATES DISTRICT COURT**  
9 **FOR THE DISTRICT OF ARIZONA**

10 True Names, Ltd. d/b/a Ethereum Name  
11 Service, a Singapore corporation, and Virgil  
12 Griffith, an individual

13 Plaintiff,

14 v.

15 GoDaddy, Inc., a Delaware corporation,  
16 and GoDaddy.com LLC, a Delaware  
17 corporation, Dynadot LLC, a California  
18 corporation, and Manifold Finance, Inc., a  
19 Delaware corporation.

20 Defendants.

Case No. 2:22-cv-01494-JJT

**DECLARATION OF JACOB CANTER  
REGARDING NOTICE TO  
DEFENDANTS AND COMPLIANCE  
WITH THE COURT'S SEPTEMBER  
6, 2022 ORDER**

21 I, Jacob Canter, declare:

22 1. I am a lawyer at Crowell & Moring LLP and counsel to Plaintiffs True  
23 Names, Ltd. and Virgil Griffith. The matters set forth herein are true and correct of my  
24 own personal knowledge and, if called as a witness, I could and would testify competently  
25 thereto. I declare under penalty of perjury under the laws of the United States that the  
26 foregoing is true and correct to the best of my knowledge.

27 2. On September 6, 2022, the Court ordered Plaintiffs to (1) "serve the  
28 remaining Defendants [other than Manifold Finance, Inc.] with the Complaint (Doc. 1),  
Summons, and TRO Motion (Doc. 2), and file certificates of service on the docket for all

1 four Defendants, by **September 7, 2022**” and (2) “provide a copy of this Order to a  
2 verified contact at each Defendant (or each Defendant’s counsel) by **September 7, 2022.**”

3 3. Plaintiffs have complied with the Court’s directive by serving the  
4 Complaint, Summons, TRO Motion, and September 6, 2022 Order on each of the  
5 Defendants by no later than September 7, 2022. In addition, to ensure that Defendants  
6 are on notice of this action and the Court’s September 6, 2022, Order, Plaintiffs have also  
7 served the same materials on the headquarters for GoDaddy, Inc. and GoDaddy.com LLC  
8 and on over two-dozen email addresses associated with persons at Dynadot LLC based  
9 on public records searches.

10 4. Plaintiffs have also complied with the Court’s directive by filing  
11 certificates of service on the docket for all four Defendants. *See* Dkt. Nos. 12-15.  
12 Additional proof of service that has been provided to me since filing the certificates of  
13 service are attached as exhibits to this declaration.

14 5. Plaintiffs have also complied with the Court’s directive by providing a copy  
15 of the Court’s September 6, 2022, Order to verified contacts at each address. As we have  
16 received no communications from any of the Defendants, the verified contacts were, as  
17 described herein, the corporate agents that accepted service of the Order.

18 **Compliance with the Court’s Order Regarding Defendant Manifold Finance, Inc.**

19 6. On September 6, 2022, I directed the process server to serve the Complaint,  
20 Summons, and TRO Motion on Manifold Finance, Inc. at the registered agent site, 651  
21 N. Broad St., Suite 201, Middletown DE, 19709.

22 7. On September 6, 2022, I received from the process server confirmation in  
23 the form of an affidavit that service of the Complaint, Summons, and TRO Motion on  
24 Manifold Finance, Inc. had been completed on September 6, 2022, at 2:12 PM. (Dkt. No.  
25 12 at 3).<sup>1</sup>

26 \_\_\_\_\_  
27 <sup>1</sup> I confirmed with the process serving agency that, while time zones are not reflected on the  
28 affidavits, the time listed is based on the time zone where the service occurred (i.e., eastern  
time zone in Delaware, pacific time zone in California, and mountain standard time zone in  
Arizona).

1           8.       On September 7, 2022, I directed the process server to serve the Court's  
2           September 6, 2022, Order on Manifold Finance, Inc. at the registered agent site, 651 N.  
3           Broad St., Suite 201, Middletown DE, 19709.

4           9.       On September 7, 2022, I received email confirmation from the process  
5           server that service of the Court's September 6, 2022, Order on Manifold Finance, Inc.  
6           had been completed. (Dkt. No. 12 at 6-7).

7           10.      On September 8, 2022, I received from the process server confirmation in  
8           the form of an affidavit that service of the Court's September 6, 2022, Order on Manifold  
9           Finance, Inc. had been completed at the registered agent site on September 7, 2022, at  
10          2:02 PM. (Ex. A at 1).

11                           **Compliance with the Court's Order Regarding Defendant GoDaddy, Inc.**

12          11.      On September 6, 2022, I directed the process server to serve the Complaint,  
13          Summons, and TRO Motion on GoDaddy, Inc. at the registered agent site, 251 Little  
14          Falls Drive, Wilmington DE, 19808.

15          12.      On September 7, 2022, I directed the process server to serve the Court's  
16          September 6, 2022, Order on GoDaddy, Inc. at the registered agent site, 251 Little Falls  
17          Drive, Wilmington DE, 19808.

18          13.      On September 7, 2022, I directed the process server to serve the Complaint,  
19          Summons, TRO Motion, and the Court's September 6, 2022, Order on GoDaddy, Inc. at  
20          the company headquarters, which I identified based on information from the company's  
21          official website, <https://www.godaddy.com>, 2155 E GoDaddy Way, Tempe AZ, 85284.

22          14.      On September 7, 2022, I received from the process server confirmation in  
23          the form of an affidavit that service of the Complaint, Summons, and TRO Motion on  
24          GoDaddy, Inc. had been completed on the registered agent site on September 6, 2022 at  
25          3:26 PM. (Dkt. No. 14 at 3).

26          15.      On September 7, 2022, I received from the process server verified  
27          confirmation that service of the Court's September 7, 2022, Order on GoDaddy, Inc. had  
28          been completed on the registered agent site at 2:37 PM. (Dkt. No. 14 at 6-7).

1           16.     On September 7, 2022, I received verified confirmation that service of the  
2 Complaint, Summons, TRO Motion, and the Court’s September 6, 2022, Order on  
3 GoDaddy, Inc. had been completed on the company headquarters on September 7, 2022,  
4 at 10:44 AM. (Dkt. No. 14 at 8-9).

5           17.     On September 8, 2022, I received from the process server confirmation in  
6 the form of an affidavit that service of the Court’s September 6, 2022, Order on GoDaddy,  
7 Inc. had been completed on the registered agent site on September 7, 2022, at 2:37 PM.  
8 (Ex. B at 1).

9           **Compliance with the Court’s Order Regarding Defendant GoDaddy.com LLC<sup>2</sup>**

10           18.     On September 6, 2022, I directed the process server to serve the Complaint,  
11 Summons, and TRO Motion on GoDaddy.com LLC at the registered agent site, 251 Little  
12 Falls Drive, Wilmington DE, 19808.

13           19.     On September 7, 2022, I directed the process server to serve the Court’s  
14 September 6, 2022, Order on GoDaddy.com LLC at the registered agent site, 251 Little  
15 Falls Drive, Wilmington DE, 19808.

16           20.     On September 7, 2022, I directed the process server to serve the Complaint,  
17 Summons, TRO Motion, and the Court’s September 6, 2022, Order on GoDaddy.com  
18 LLC at the company headquarters, which I identified based on information from the  
19 company’s official website, <https://www.godaddy.com>, 2155 E GoDaddy Way, Tempe  
20 AZ, 85284.

21           21.     On September 7, 2022, I received from the process server confirmation in  
22 the form of an affidavit that service of the Complaint, Summons, and TRO Motion on  
23 GoDaddy.com LLC had been completed on the registered agent site on September 6,  
24 2022 at 3:26 PM. (Dkt No. 13 at 3).

25  
26 \_\_\_\_\_  
27 <sup>2</sup> Dkt No. 13 at 6-7 erroneously includes verified confirmation of service of the  
28 September 6, 2022, Order on GoDaddy, Inc., not GoDaddy.com LLC. As described  
herein, the September 6, 2022, Order was served on GoDaddy.com LLC at the company  
headquarters (Dkt. No. 13 at 8-9) and via certified mail at the registered agent site (Dkt.  
No. 16-3 (Exhibit C)).

1           22.    On September 7, 2022, I received from the process server verified  
2 confirmation that service of the Complaint, Summons, TRO Motion, and the Court’s  
3 September 6, 2022, Order on GoDaddy.com LLC had been completed on the company  
4 headquarters on September 7, 2022, at 10:44 AM. (Dkt. No. 13 at 8-9).

5           23.    On September 8, 2022, I received from the process server confirmation in  
6 the form of an affidavit that service of the Court’s September 6, 2022, Order on  
7 GoDaddy.com LLC had been completed via certified mail on the registered agent site on  
8 September 7, 2022, at 2:37 PM. (Ex. C at 1).

9           24.    On September 8, 2022, I received from the process server confirmation in  
10 the form of an affidavit that service of the Complaint, Summons, TRO Motion, and the  
11 Court’s September 6, 2022, Order on GoDaddy.com LLC had been completed on the  
12 company headquarters on September 7, 2022, at 10:44 AM. (Ex. D at 1).

13                   **Compliance with the Court’s Order Regarding Defendant Dynadot LLC**

14           25.    On September 6, 2022, I directed the process server to serve the Complaint,  
15 Summons, and TRO Motion on Dynadot LLC at the location listed on the California  
16 Secretary of State’s website as most recently associated with the company’s agent, 210  
17 S Ellsworth Ave., Unit 345, San Mateo, CA 94401.

18           26.    On September 7, 2022, I directed the process server to serve the Court’s  
19 September 6, 2022, Order on Dynadot LLC at the location listed on the California  
20 Secretary of State’s website as most recently associated with the company’s agent, 210  
21 S Ellsworth Ave., Unit 345, San Mateo, CA 94401.

22           27.    On September 7, 2022, I directed the process server to serve the Complaint,  
23 Summons, TRO Motion, and the Court’s September 6, 2022, Order on Dynadot LLC at  
24 the other location listed on the California Secretary of State’s website as associated with  
25 the company’s agent, 205 E. 3rd Ave., Suite 314, San Mateo, CA 94401.

26           28.    On September 7, 2022, I directed the process server to serve the Complaint,  
27 Summons, TRO Motion, and the Court’s September 6, 2022, Order on Dynadot LLC at  
28 the home address most recently associated with the company’s agent and CEO, Todd

1 Han, which I identified based on public records searches. I am prepared, at the Court's  
2 direction, to provide the personal home address to the Court under seal, to protect the  
3 individual's privacy.

4 29. On September 7, 2022, I directed the process server to server the  
5 Complaint, Summons, TRO Motion, and the Court's September 6, 2022, Order on  
6 Dynadot LLC via certified mail, with return receipt requested, at the following addresses:  
7 210 S Ellsworth Ave., Unite 345, San Mateo, CA 94401, and PO BOX 607 San Mateo,  
8 CA, 94401.

9 30. On September 7, 2022, I had public records searches completed to identify  
10 the email addresses of all persons associated with Dynadot LLC, located in or around San  
11 Mateo, CA.

12 31. Based on this investigation, I identified forty-four email addresses for  
13 persons potentially associated with Dynadot LLC. The nine email addresses that include  
14 an @dynadot domain are: [jacqueline.daly@dynadot.com](mailto:jacqueline.daly@dynadot.com); [lburgess@dynadot.com](mailto:lburgess@dynadot.com);  
15 [ccastro@dynadot.com](mailto:ccastro@dynadot.com); [bmckay@dynadot.com](mailto:bmckay@dynadot.com); [christinec@dynadot.com](mailto:christinec@dynadot.com);  
16 [christine@dynadot.com](mailto:christine@dynadot.com); [todd@dynadot.com](mailto:todd@dynadot.com); [tony.huang@dynadot.com](mailto:tony.huang@dynadot.com);  
17 [kathryn@dynadot.com](mailto:kathryn@dynadot.com). I am prepared, at the Court's direction, to provide the remaining  
18 thirty-five personal email addresses to the Court under seal, to protect the privacy of the  
19 individual's associated with the personal addresses.

20 32. On September 7, 2022, I served via email to each of forty-four addresses  
21 the Complaint, Summons, TRO Motion, and the Court's September 6, 2022, Order. The  
22 emails failed to deliver to eighteen of the personal addresses. Email service was  
23 successful on the remaining accounts.

24 33. I initially attempted to serve via a single email all of the materials to each  
25 of the @dynadot addresses, but I received a bounce-back notification that the file was too  
26 large. Thus, I served the materials on each of the @dynadot addresses via email in two  
27 parts (two separate emails), with the Court's September 6, 2022 Order, included in both  
28 emails. I have received no bounce-back notification after serving the materials in two  
parts to the @dynadot addresses.

1           34. On September 7, 2022, I received from the process server verified  
2 confirmation that service of the Complaint, Summons, TRO Motion, and the Court's  
3 September 6, 2022, Order had been completed in-person at one of the sites listed on the  
4 California Secretary of State's website as associated with the company's agent, 205 E,  
5 3rd Avenue, Suite 314, San Mateo CA, 94401, on September 7, 2022, at 2:30 PM. (Dkt.  
6 No. 15 at 3-4).

7           35. On September 7, 2022, I received from the process server verified  
8 confirmation that service of the Complaint, Summons, TRO Motion, and the Court's  
9 September 6, 2022, Order had been completed via certified mail on the following  
10 addresses: 210 S Ellsworth Ave., Unit 345, San Mateo, CA 94401 and PO BOX 607 San  
11 Mateo, CA, 94401, on September 7, 2022, at 4:39 PM (Dkt. No. 15 at 5-8).

12           36. On September 8, 2022, I received from the process server confirmation in  
13 the form of an affidavit that service of the Complaint, Summons, TRO Motion, and the  
14 Court's September 6, 2022, Order had been completed in-person at one of the sites listed  
15 on the California Secretary of State's website as associated with the company's agent,  
16 205 E, 3rd Avenue, Suite 314, San Mateo CA, 94401, on September 7, 2022, at 2:30 PM.  
(Ex. E at 1).

17           37. On September 8, 2022, I received from the process server confirmation in  
18 the form of an affidavit that service of the Complaint, Summons, TRO Motion, and the  
19 Court's September 6, 2022, Order had been completed on Dynadot LLC at the location  
20 listed on the California Secretary of State's website as most recently associated with the  
21 company's agent, 210 S Ellsworth Ave., Unit 345, San Mateo, CA 94401, via certified  
22 mail on September 7, 2022, at 4:39 PM. (Ex. F at 1).

23           38. On September 8, 2022, I received from the process server confirmation in  
24 the form of an affidavit that service of the Complaint, Summons, TRO Motion, and the  
25 Court's September 6, 2022, Order had been completed on Dynadot LLC by certified mail  
26 at PO BOX 607 San Mateo, CA, 94401, on September 7, 2022, at 4:39 PM. (Ex. G at 1).

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

Executed in San Francisco, California, on this 8th day of September 2022.

/s/ Jacob Canter