

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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MIKHAIL FRIDMAN, <i>et al.</i> ,)	
)	
	Plaintiffs,)	
)	
v.)	Civil Case No. 1:17-cv-2041-RJL
)	
ORBIS BUSINESS INTELLIGENCE)	
LIMITED, <i>et al.</i>)	
)	
	Defendants.)	
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**PLAINTIFFS’ UNOPPOSED MOTION FOR LEAVE TO SERVE
SUBPOENAS ON DANIEL JONES AND THE DEMOCRACY
INTEGRITY PROJECT VIA ALTERNATIVE SERVICE**

Plaintiffs Mikhail Fridman, Petr Aven and German Khan respectfully move this Court pursuant to Fed. R. Civ. P. 45 for an order granting them leave to serve certain third party subpoenas via means of service other than personal service. Specifically, Plaintiffs seek an order stating that service on third parties Daniel J. Jones and The Democracy Integrity Project, a defunct D.C. Corporation, through Mr. Jones as last reported principal officer, by (1) posting a copy of the subpoena outside the lobby of Mr. Jones’ place of residence and leaving a copy with the concierge; (2) delivering a copy by certified mail to Mr. Jones’ place of residence; 3) email to the address info@advdem.org, which is the email address for Advance Democracy Inc., a Delaware corporation with which Mr. Jones is associated; 4) email to daniel@thepqg.com, the email address provided for Mr. Jones as registered agent for The Penn Quarter Group, a District of Columbia limited liability company; and 5) certified mail to the Penn Quarter Group at “801 Pennsylvania Ave, NW, c/o Daniel Jones, Washington, D.C. 20004,” which is the registered business address and registered agent address for that company, shall be deemed good and

sufficient service under Rule 45. Plaintiffs have expended substantial time, energy, and money attempting to serve Mr. Jones and TDIP via personal service. Because Mr. Jones appears to be attempting to evade service and service on Mr. Jones and TDIP in the above described manner is calculated to provide actual notice of the Subpoena, the Court should deem such service to be good and sufficient service under Rule 45.

Pursuant to Local Civil Rule 7(m), on Monday, August 3, 2020 Plaintiffs' counsel met and conferred with Defendants' counsel with respect to the requested relief. Defendants' counsel indicated that, while they have not seen the motion papers, they do not oppose the relief requested, and otherwise take no position on the motion.

For the reasons set forth in Plaintiffs' Memorandum of Points and Authorities the Motion should be granted. A proposed order is enclosed.

Dated: Washington, D.C.
August 5, 2020

Respectfully submitted,

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of August 2020, I electronically filed and served the foregoing using the CM/ECF system.

/s/ Kim Sperduto
Kim Sperduto