

**REQUEST FOR SERVICE ABROAD OF JUDICIAL OR EXTRAJUDICIAL DOCUMENTS PURSUANT TO THE ADDITIONAL PROTOCOL TO THE INTER-AMERICAN CONVENTION ON LETTERS ROGATORY**

FORM A

LETTER ROGATORY <sup>1</sup>

1

REQUESTING JUDICIAL OR OTHER ADJUDICATORY AUTHORITY

Name: **United States District Court, District of Colorado**

Address Line 1: **901 19th Street**  
 Address Line 2: **Denver, CO 80294**  
 Address Line 3:  
 Address Line 4:

2

PLAINTIFF: **Grupo Gestion**  
 v. **Cellular, S.A. DE C.V.**  
 DEFENDANT: **Jorge Beltran, et al.**

DOCKET No: **1:14-cv-03017-CBS**

3

CENTRAL AUTHORITY OF THE STATE OF ORIGIN

Office of International Judicial

Name: **Assistance, Civil Division Benjamin Franklin**

Address Line 1: **Station**  
 Address Line 2: **P.O. Box 14360**  
 Address Line 3: **Washington, D.C.**  
 Address Line 4: **20004, United States**

4

CENTRAL AUTHORITY OF THE STATE OF DESTINATION

Name: **Ministerio de Justicia**

Address Line 1: **Scipion de Llona N 350**  
 Address Line 2: **Miraflores Ciudad**  
 Address Line 3: **Lima Estado, Peru**  
 Address Line 4:

5

REQUESTING PARTY

**Grupo Gestion Celular,**

Name: **S.A. DE C.V. Lazaro Cardenas**

Address Line 1: **435, piso 11, Zona**  
 Address Line 2: **Valle Oriente**  
 Address Line 3: **San Pedro Garza,**  
 Address Line 4: **Garcia 66266, Mexico**

6

COUNSEL TO THE REQUESTING PARTY

**Randazza Legal Group**

Name:

Address Line 1: **3625 S. Town Center**  
 Address Line 2: **Drive, Suite 150**  
 Address Line 3: **Las Vegas, NV**  
 Address Line 4: **89135, United States**

PERSON DESIGNATED TO ACT IN CONNECTION WITH THE LETTER ROGATORY

Name: **Ronald D. Green**

Address Line 1: **3625 S. Town Center Drive**  
 Address Line 2: **Suite 150**  
 Address Line 3: **Las Vegas, NV 89135**  
 Address Line 4: **United States**

Is this person responsible for costs and expenses?  
 Yes  No

If not, check in the amount of \$ \_\_\_\_\_ is attached.  
 (Or proof of payment is attached.)

<sup>1</sup> Complete the original and two copies of this form; if A (1) is applicable, attach the original and two copies of the translation of this item in the language of the State of destination.

The Central Authority signing the letter rogatory has the honor to transmit to you in triplicate the documents listed below and, in conformity with the protocol to the Inter-American Convention on Letters Rogatory:

- \* A. Requests their prompt service on:  
Gian Chavez

Jr. Ciro Alegre

Lima Lima Lima 7, PE

The undersigned authority requests the service be carried out in the following manner:

- \* (2) By service personally on the identified addressee or, in the case of a legal entity, on its authorized agent; or
  - \* (3) If the person or the authorized agent of the entity to be served is not found, service shall be made in accordance with the law of the State of destination.
- \* B. Requests the delivery of the documents listed below to the following judicial or administrative authority:

Authority: Ministerio de Justicia

Scipion de Llona N 350

Miraflores Ciudad, Lima Estado, Peru.

- \* C. Requests the Central Authority of the State of destination to return to the Central Authority of the State of origin one copy of the documents listed below and attached to this letter rogatory, and an executed Certificate of the attached Form C.



Done at Denver, CO this 3<sup>rd</sup> date of February, 2015

Yvonne Davis  
Signature and stamp of the  
judicial or other adjudicatory  
authority of the State of origin

\_\_\_\_\_  
Signature and stamp of the  
Central Authority of the  
State of origin

Title or other identification of each document to be delivered:

Complaint in United States District Court for the District of Colorado, Case No. 1:14-cv-03017-CBS,  
Amended Complaint and Exhibits, Summons for Gian Chavez.

(Attach additional pages, if necessary)

\*Delete if inapplicable

**ANNEX TO THE ADDITIONAL PROTOCOL  
TO THE INTER-AMERICAN CONVENTION OF LETTERS ROGATORY**

FORM B

ESSENTIAL INFORMATION FOR THE ADDRESSEE <sup>1</sup>

To (Name and address of the person being served) Gian Chavez  
Jr. Ciro AlegreAa, Lima Lima Lima 7, PE.

You are hereby informed that (Brief statement of nature of service) \_\_\_\_\_  
You are being personally served with the Complaint, Amended Complaint, and Summons in Case No.  
1:14-cv-03017-CBS in the United States District Court for the District of Colorado.

A copy of the letter rogatory that gives rise to the service or delivery of these documents is attached to this document. This copy also contains essential information for you. Also attached are copies of the complaint or pleading initiating the action in which the letter rogatory was issued, of the documents attached to the complaint or pleading, and of any rulings that ordered the issuance of the letter rogatory.

ADDITIONAL INFORMATION

I\*

FOR SERVICE

- A. The document being served on you (original or copy) concerns the following:  
Lawsuit alleging copyright infringement, unfair competition, false advertising, violation of the CFAA, Intentional interference with contractual advantage, misappropriation, and conspiracy.
- B. The remedies sought or the amount in dispute is as follows:  
Injunctive relief, actual damages, statutory damages, aggravated damages, punitive damages, and costs and and attorneys' fees.
- C. By this service, you are requested:  
To respond to the Complaint in this action.
- D. \* In case of service on you as a defendant you an answer the complaint before the judicial or other adjudicatory authority specified in Form A, Box 1 (State place, date and hour): Twenty-one (21) calendar days from the date of service of the Complaint and Summons, by 5:00 pm Mountain Time Zone. Submit Answer to address in Form A, Box 1.

\* You are being summoned to appear as: a Defendant.

<sup>1</sup> Complete the original and two copies of this form in the language of the State of origin and two copies in the language of the State of destination.

\* Delete if applicable.

E. If you fail to comply, the consequences might be: a default judgment entered against you.  
\_\_\_\_\_  
\_\_\_\_\_

F. You are hereby informed that a defense counsel appointed by the Court or the Following legal aid societies are available to you at the place where the proceeding is pending.

Name: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_

The documents listed in Part III are being furnished to you so that you may better understand and defend your interests.

\*Delete if inapplicable.



**ANNEX TO THE ADDITIONAL PROTOCOL  
TO THE INTER-AMERICAN CONVENTION ON LETTERS ROGATORY**

FORM C

CERTIFICATE OF EXECUTION <sup>1</sup>

To: \_\_\_\_\_  
\_\_\_\_\_

(Name and address of judicial or other adjudicatory authority that issued the letter rogatory)

In conformity with the Additional Protocol to the Inter-American Convention on Letters Rogatory, signed at Montevideo on May 8, 1979, and in accordance with the attached original letter rogatory, the undersigned Central Authority has the honor to certify the following:

- \* A. That one copy of the documents attached to this Certificate has been served or delivered as follows:

Date: \_\_\_\_\_

At (Address) \_\_\_\_\_

By one of the following methods authorized by the Convention.

- \* (1) In accordance with the special procedure or additional formalities that are described below, as provided for in the second paragraph of Article 10 of the above mentioned Convention, or

\_\_\_\_\_  
\_\_\_\_\_

- \* (2) By service personally on the identified addressee or, in the case of a legal entity, on its authorized agent, or

- \* (3) If the person or the authorized agent of the entity to be served was not found, in accordance with the law of the State of destination; (Specify method used)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

<sup>1</sup> Complete the original and one copy in the language of the State of destination.

\*Delete if inapplicable

- \* B. That the documents referred to in the letter rogatory have been delivered to:

Identity of person \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Relationship to the addressee \_\_\_\_\_  
(Family,business or other)  
\_\_\_\_\_  
\_\_\_\_\_

- \* C. That the documents attached to the Certificate have not been served or delivered for the following reason(s):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- \* D In conformity with the Protocol, the party requesting execution of the letter rogatory is requested to pay the outstanding balance of costs in the amount indicated in the attached statement.

Done at \_\_\_\_\_ the \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_

\_\_\_\_\_  
(Signature and stamp of Central Authority of the State of destination)

Where appropriate, attach originals or copies of any additional documents proving service or delivery, and identify them

\*Delete if inapplicable