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9 *Attorneys for Plaintiff MEHRDAD TAGHDIRI*

10 **UNITED STATES DISTRICT COURT**
 11 **FOR THE DISTRICT OF NEVADA**

13 MEHRDAD TAGHDIRI, an individual,

14 **Plaintiff,**

15 vs.

16 MYKALAI KONTILAI, an individual; and
 17 COLLECTORS COFFEE, INC., a Nevada
 18 corporation,

19 **Defendants.**

Case No.: 2:18-cv-01475-RFB-VCF

**PLAINTIFF’S MOTION FOR
 EXTENSION OF TIME TO SERVE
 PROCESS ON DEFENDANT MYKALAI
 KONTILAI AND FOR LEAVE TO
 SERVE BY PUBLICATION**

20
 21 COMES NOW Plaintiff MEHRDAD TAGHDIRI, by and through his attorneys, and
 22 moves the Court for an order (1) extending by 120 days the time to serve process on Defendant
 23 MYKALAI KONTILAI (“Mr. Kontilai”) and (2) granting leave to allow Plaintiff to effect
 24 service by publication. This motion is based on the grounds that numerous good faith attempts
 25 have been made to serve Mr. Kontilai personally and by mail and it is believed that he is
 26 intentionally avoiding service. All attempts to serve Mr. Kontilai at his residential and business
 27 addresses in the State of Nevada have been unsuccessful.

1 This motion is made and based on FED. R. CIV. P. 4(m) and 4(e)(1), Nev. R. Civ. P.
2 4(e)(1), the declaration and affidavits attached hereto and Memorandum of Points and
3 Authorities that follows.

4 HEJMANOWSKI & MCCREA LLC

5
6 By: */s/Charles H. McCrea*
7 Charles H. McCrea (SBN #104)
8 520 South Fourth Street, Suite 320
9 Las Vegas, Nevada 89101

10 Guy C. Nicholson (admitted *pro hac vice*)
11 BROWNE GEORGE ROSS LLP
12 2121 Avenue of the Stars, Suite 2800
13 Los Angeles, California 90067

14 *Attorneys for Plaintiff MERHDAD TAGHDIRI*

15 **MEMORANDUM OF POINTS AND AUTHORITIES**

16 **I. STATEMENT OF FACTS**

17 To date, in spite of Plaintiff's diligent and good faith efforts, he has been unable to effect
18 service of process on Mr. Kontilai who appears to be intentionally avoiding service. As detailed
19 in the attached Declaration of Lori Sambol Brody,¹ consulting a number of reliable sources Ms.
20 Brody identified several addresses at which Mr. Kontilai could reasonably be expected to be
21 present to accept service of process:

- 22 • Through the Nevada Secretary of State website, Mr. Kontilai was listed as an
23 officer of co-defendant Collectors Coffee, Inc. and his address was given as: 3565
24 Las Vegas Blvd. South, Ste. 337, Las Vegas, NV. Brody Decl., Ex. 1, ¶ 4.
- 25 • The records of the Nevada Department of Motor Vehicles list two addresses for
26 Mr. Kontilai: 566 Tam O'Shanter, Las Vegas, NV 89109 and 3565 Las Vegas
27 Blvd. South, Ste. 337, Las Vegas, NV 89109. Brody Decl., Ex. 1, ¶ 5.

28 ¹ Declaration of Lori Sambol Brody dated 10/3/18, Ex. 1 attached ("Brody Decl.").

- Through a private investigator retained by Ms. Brody identified two additional addresses where it was believed Mr. Kontilai might be found: MGM Grand Tower Suites, 145 E. Harmon Avenue, Unit 10-814, Las Vegas, NV 89109 and 3722 Las Vegas, Blvd. South, Unit 3502, Las Vegas, NV 89158. Brody Decl., Ex. 1, ¶ 7.

From June 15, 2018 through September 27, 2018, Plaintiff has attempted to effect personal service of the Summons and Complaint in this action on Mr. Kontilai as follows:

DATE & TIME	ADDRESS	REFERENCE
6/15/18 1:11 PM	3565 Las Vegas Blvd. South, Ste. 337 Las Vegas, NV 89109	Affidavit of Due Diligence of Anthony Spada (“Spada 8/3/18 Affidavit”), Ex. 2 attached.
6/15/18 1:29 PM	566 Tam O’Shanter Las Vegas, NV 89109	Spada 8/3/18 Affidavit, Ex. 2.
6/16/18 11:42 AM	566 Tam O’Shanter Las Vegas, NV 89109	Spada 8/3/18 Affidavit, Ex. 2.
6/18/18 8:00 AM	566 Tam O’Shanter Las Vegas, NV 89109	Spada 8/3/18 Affidavit, Ex. 2.
6/19/18 7:29 PM	566 Tam O’Shanter Las Vegas, NV 89109	Spada 8/3/18 Affidavit, Ex. 2.
7/11/18 7:38 PM	566 Tam O’Shanter Las Vegas, NV 89109	Spada 8/3/18 Affidavit, Ex. 2.
7/12/18 9:18 AM	145 E. Harmon, Unit 10-814 Las Vegas, NV 89109	Spada 8/3/18 Affidavit, Ex. 2.
7/12/18 10:14 AM	3722 Las Vegas Blvd. South, Unit 3502 Las Vegas, NV 89158	Spada 8/3/18 Affidavit, Ex. 2.
7/16/18 11:46 AM	145 E. Harmon, Unit 10-814 Las Vegas, NV 89109	Spada 8/3/18 Affidavit, Ex. 2.
7/16/18 12:38 PM	3722 Las Vegas Blvd. South, Unit 3502 Las Vegas, NV 89158	Spada 8/3/18 Affidavit, Ex. 2.
7/17/18 3:42 PM	145 E. Harmon, Unit 10-814 Las Vegas, NV 89109	Spada 8/3/18 Affidavit, Ex. 2.
7/17/18 4:14 PM	3722 Las Vegas Blvd. South, Unit 3502 Las Vegas, NV 89158	Spada 8/3/18 Affidavit, Ex. 2.
9/14/18 2:32 PM	566 Tam O’Shanter Las Vegas, NV 89109	Affidavit of Due Diligence of Anthony Spada (“Spada 10/4/18 Affidavit”), Ex. 3 attached.
9/14/18 5:46 PM	566 Tam O’Shanter Las Vegas, NV 89109	Affidavit of Due Diligence of Judith Mae All (“All 10/3/18 Affidavit”), Exhibit 4 attached.

9/15/18 3:17 PM	566 Tam O'Shanter Las Vegas, NV 89109	All 10/3/18 Affidavit, Ex. 4
9/17/18 8:13 AM	566 Tam O'Shanter Las Vegas, NV 89109	Spada 10/4/18 Affidavit, Ex. 3.
9/19/18 7:13 PM	566 Tam O'Shanter Las Vegas, NV 89109	Spada 10/4/18 Affidavit, Ex. 3.
9/20/18 11:01 AM	566 Tam O'Shanter Las Vegas, NV 89109	Spada 10/4/18 Affidavit, Ex. 3.
9/25/18 10:03 AM	Collector's Café/Collectors Coffee 400 S. 4 th Street Las Vegas, NV 89109	Spada 10/4/18 Affidavit, Ex. 3.
9/27/18 4:47 PM	Collector's Coffee/Collectors Coffee 8020 Las Vegas Blvd. South Las Vegas, NV 89123	Spada 10/4/18 Affidavit, Ex. 3.

Plaintiff has also attempted to serve copies of the Summons and Complaint in this action on Mr. Kontilai by mail, with return receipt requested, sent to the following addresses:

3565 Las Vegas Blvd. South, Ste. 337
Las Vegas, NV 89109

566 Tam O'Shanter
Las Vegas, NV 89109

145 E. Harmon, Unit 10-814
Las Vegas, NV 89109

and

3722 Las Vegas Blvd. South, Unit 3502
Las Vegas, NV 89158

Brody Decl., Ex. 1, ¶ 9. All of the envelopes were returned unopened with the return receipt card unsigned. *Id.*, ¶ 10.

II. LAW AND ANALYSIS

A. Standard for Extension of Time to Serve

FED. R. CIV. P. 4(m) provides in pertinent part as follows:

If a defendant is not served within 120 days after the complaint is filed, the court – on motion or on its own after notice to the plaintiff – must dismiss the action without prejudice against the defendant or order that service be made with a specified time. But if the plaintiff shows good cause for the failure, the court must

1 extend the time for service for an appropriate period.

2 Courts have broad discretion to extend time for service under Rule 4(m). *Efaw v.*
3 *Williams*, 473 F.3d 1038, 1041 (9th Cir. 203). The United States Supreme Court has ruled that
4 the 120-day time period for service contained in Rule 4(m) “operates not as an outer limit subject
5 to reduction, but as an irreducible allowance.” *Henderson v. United States*, 517 U.S. 654, 661
6 (1996). Rule 4(m) does “not tie the hands of the district court after the 120-day period has
7 expired.” *See Mann v. American Airlines*, 324 F.3d 1088, 1090 (9th Cir. 2003). Rather, Rule
8 4(m) “explicitly permits a district court to grant an extension of time to serve the complaint after
9 that 120-day period.” *See id.* (emphasis in original).

11 The Advisory Committee Notes to Rule 4(m) provide that the rule explicitly provides that
12 the court “shall allow additional time if there is good cause for the plaintiff’s failure to effect
13 service in the prescribed 120 days,” and “authorizes the court to relieve a plaintiff of the
14 consequences of an application of [Rule 4(m)] even if there is not good cause shown.” *See* FED.
15 R. CIV. P. 4(m). Advisory Committee Notes, 1993 Amendments. In general, a plaintiff
16 demonstrates “good cause” by a show of diligence. *See* Wright & Miller, *Federal Practice and*
17 *Procedure: Civil 3d* § 1337. *See also, Bouddette v. Barnette*, 923 F.2d 754, 756 (9th Cir. 1991)
18 (“At a minimum, good cause means excusable neglect.”)

20 Exhibits 1 through 4 demonstrate Plaintiff’s diligent effort to serve Mr. Kontilai and good
21 cause clearly exists to extend the time to effect service. Plaintiff requests an extension of 120
22 days.

24 **B. Leave Should Be Granted to Serve Mr. Kontilai by Publication**

25 Fed. R. Civ. P. 4(e)(1) provides for service in two ways: (1) “by following state law for
26 serving a summons in an action brought in courts of general jurisdiction in the state where the
27 district court is located or where service is made” or (2) by delivering a copy of the summons

1 and complaint to the party personally, leaving it at the party's dwelling or usual place of abode
2 with someone of suitable age and discretion who resides there, or delivering it to an agent
3 authorized by appointment or by law. Fed. R. Civ. P. 4(e)(1). In Nevada, Rule 4 of the Nevada
4 Rules of Civil Procedure governs service of process under state law. Parties are required to
5 personally serve summonses and complaints upon natural defendants. Where that is not possible
6 because a defendant is, for example, avoiding personal service, a plaintiff may obtain leave of
7 court to serve by publication.
8

9 A party seeking to serve by publication must seek leave of court by filing an affidavit
10 demonstrating due diligence in attempting to personally serve. Nevada courts generally consider
11 several key factors when evaluating whether a plaintiff seeking service by publication has
12 demonstrated due diligence. Among other things, Nevada courts consider the number of
13 attempts of service made by the plaintiff and methods used to locate the defendant. See, e.g.,
14 Price v. Dunn, 106 Nev. 100, 103 (1990); Abreu v. Gilmer, 115 Nev. 308, 311 (1999); McNair v.
15 Rivera, 110 Nev. 463, 464 (1994). Where "other reasonable methods exist for locating the
16 whereabouts of a defendant," the court may deny a request to serve by publication. See Price,
17 106 Nev. at 103. But where the court determines that the plaintiff has exercised due diligence
18 in attempting service, and consulted available information to locate a defendant, service by
19 publication should be granted. See Abreu, 115 Nev. at 311 (attempts at service at possible and
20 consulting telephone company directories sufficient to show due diligence.).
21
22

23 NEV. R. CIV. P. 4(e) provides:

24 (1) Service by Publication.

25 (i) General. In addition to methods of personal service, when the
26 person on whom service is to be made resides out of the state, or has departed
27 from the state, or cannot, after due diligence, be found within the state, or by
28 concealment seeks to avoid the service of summons, and the fact shall appear, by
affidavit, to the satisfaction of the court or judge thereof, and it shall appear,
either by affidavit or by a verified complaint on file, that a cause of action exists

1 against the defendant in respect to whom the service is to be made, and that the
2 defendant is a necessary or proper party to the action, such court or judge may
grant an order that the service be made by the publication of summons.

3
4 Provided, when said affidavit is based on the fact that the party on whom
5 service is to be made resides out of the state, and the present address of the party
6 is unknown, it shall be a sufficient showing of such fact if the affiant shall state
7 generally in such affidavit that at a previous time such person resided out of this
8 state in a certain place (naming the place and stating the latest date known to
9 affiant when such party so resided there); that such place is the last place in which
10 such party resided to the knowledge of affiant; that such party no longer resides at
11 such place; that affiant does not know the present place of residence of such party
or where such party can be found; and that affiant does not know and has never
been informed and has no reason to believe that such party now resides in this
state; and, in such case, it shall be presumed that such party still resides and
remains out of the state, and such affidavit shall be deemed to be a sufficient
showing of due diligence to find the defendant. This rule shall apply to all manner
of civil actions, including those for divorce.

12 (ii) Property. In any action which relates to, or the subject of which is,
13 real or personal property in this state in which such person defendant or
14 corporation defendant has or claims a lien or interest, actual or contingent,
15 therein, or in which the relief demanded consists wholly or in part of excluding
16 such person or corporation from any interest therein, and the said defendant
17 resides out of the state or has departed from the state, or cannot after due diligence
be found within the state, or by concealment seeks to avoid the service of
summons, the judge or justice may make an order that the service be made by the
publication of summons; said service by publication shall be made in the same
manner as now provided in all cases of service by publication.

18 (iii) Publication. The order shall direct the publication to be made in a
19 newspaper, published in the State of Nevada, to be designated by the court or
20 judge thereof, for a period of 4 weeks, and at least once a week during said time.
21 In addition to in-state publication, where the present residence of the defendant is
22 unknown the order may also direct that publication be made in a newspaper
23 published outside the State of Nevada whenever the court is of the opinion that
24 such publication is necessary to give notice that is reasonably calculated to give a
25 defendant actual notice of the proceedings. In case of publication, where the
26 residence of a nonresident or absent defendant is known, the court or judge shall
also direct a copy of the summons and complaint to be deposited in the post
office, directed to the person to be served at the person's place of residence. The
service of summons shall be deemed complete in cases of publication at the
expiration of 4 weeks from the first publication, and in cases when a deposit of a
copy of the summons and complaint in the post office is also required, at the
expiration of 4 weeks from such deposit.

27 Here, Plaintiff has consulted website directories and government agency websites in
28

1 order to try and locate Mr. Kontilai and sent private investigators/process servers to those
2 addresses, all to no avail. Plaintiff has also attempted to serve copies of the Summons and
3 Complaint by mail, also to no avail. The Court should find that Plaintiff has made adequate
4 good faith efforts to locate and serve Mr. Kontilai and that Plaintiff may now resort to service by
5 publication.

6
7 **III. CONCLUSION**

8 The Court should issue an order extending Plaintiff's time to effect service of process on
9 Mr. Kontilai for 120 days from the date hereof and allowing Plaintiff to effect such service by
10 publication in accordance with the provisions of NEV. R. CIV. P. 4(e).

11
12 Respectfully submitted,

13 HEJMANOWSKI & MCCREA LLC

14 By: /s/Charles H. McCrea

15 Charles H. McCrea (SBN #104)
16 520 South Fourth Street, Suite 320
Las Vegas, Nevada 89101

17 Guy C. Nicholson (admitted *pro hac vice*)
18 BROWNE GEORGE ROSS LLP
19 2121 Avenue of the Stars, Suite 2800
Los Angeles, California 90067

20 *Attorneys for Plaintiff MERHDAD TAGHDIRI*

21 APPROVED:

22 DATED this 23rd day of October, 2018.

23
24 

25 _____
26 RICHARD F. BOULWARE, II
27 United States District Judge

EXHIBIT 1

EXHIBIT 1

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DECLARATION OF LORI SAMBOL BRODY

I, Lori Sambol Brody, declare and state as follows:

1. I am an attorney at law, duly admitted to practice before this Court and all courts of the State of California. I am an associate with Browne George Ross LLP, counsel of record for Plaintiff Mehrdad Taghdiri in this matter. I have firsthand, personal knowledge of the facts set forth below and if called as a witness could competently testify thereto.

2. This action was filed in the United States District Court for the Central District of California on June 12, 2018.

3. We have made numerous attempts to serve defendant Mykalai Kontilai with the initial California summons and complaint, which are described in more detail in the concurrently filed declarations of Ace Legal and Bullet Legal Services.

Initial Attempts at Service

4. I conducted a business records search for the other defendant in the case, Collector's Coffee, Inc., through the Nevada Secretary of State website. Mr. Kontilai was listed as an officer of Collector's Coffee, Inc., and his address was given as:

3565 Las Vegas Blvd. #337
Las Vegas, NV 89109

A true and correct copy of the information from the Nevada Secretary of State website (last accessed October 3, 2018) is attached hereto as Exhibit A.

5. Because I suspected that the address in paragraph 4 was a post office box, a Westlaw search was conducted, on my instruction and supervision, to determine other potential current addresses for Mr. Kontilai. We found the following potential current address:

566 Tam O Shanter
Las Vegas, NV 89109

This address was obtained from the Department of Motor Vehicles records as a mailing address for the most recent registration for Mr. Kontilai's automobile. A true and correct copy of the portion of the Westlaw printout showing that address is attached as Exhibit B. (Note also that Secretary of State printout attached as Exhibit A states that two directors of Collector's Coffee – Omar Liceaga and Adriana Sanchez – reside at the Tam O Shanter address.)

1 3722 Las Vegas Blvd. South, Unit 3502
2 Las Vegas, NV 89158

3 10. All of the envelopes were returned to us unopened with the return receipt card
4 unsigned in late July 2018 and early August 2018. Copies of the four envelopes are attached as
5 Exhibit C.

6 **Additional Attempts**

7 11. On August 7, 2018, Judge Dale S. Fischer for the United States District Court for
8 the Central District of California ordered this action to be transferred from the Central District of
9 California to the District of Nevada. On September 1, 2018, the District of Nevada issued a
10 summons for Mr. Kontilai.

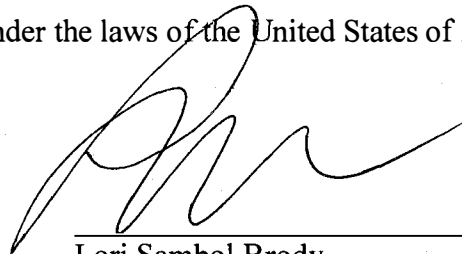
11 12. I consulted with another private investigator, Omar Rodriguez at Pivotal
12 Investigations. Mr. Rodriguez concluded that the Tam O Shanter address was most likely the
13 current address of Mr. Kontilai and his wife. He also informed me that an entity named
14 Collector's Café, owned by Mr. Kontilai, was located at 400 S. 4th Street, Las Vegas, CA 89101.

15 13. Therefore, on September 13, 2018, I requested a process server, Bullet Legal
16 Services, to again attempt to serve Mr. Kontilai at the Tam O Shanter address. The process server
17 informed me that he was told that Mr. Kontilai did not live at that address.

18 14. On September 24, 2018, I requested that Bullet Legal Services attempt to serve Mr.
19 Kontilai at the 400 S. 4th Street address for Collector's Café, and another address I had found in
20 recent insurance documents for Collector's Coffee, 8020 Las Vegas Blvd. South, Las Vegas, NV
21 89123. The process server informed me that Collector's Café was not at the first address and that
22 Mr. Kontilai and Collector's Café had a mailbox at the second address.

23 Executed this 3d day of October 2018, at Los Angeles, California.

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

26 

27 _____
Lori Sambol Brody

EXHIBIT A

EXHIBIT A

NEVADA SECRETARY OF STATE

Barbara K. Cegavske

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COLLECTOR'S COFFEE, INC.

[Manage this Business](#)

Business Entity Information

Status: Active	File Date: 11/1/2007
Type: Domestic Corporation	Entity Number: E0754932007-3
Qualifying State: NV	List of Officers Due: 11/30/2018
Managed By:	Expiration Date:
NV Business ID: NV20071411377	Business License Exp: 11/30/2018

Additional Information

Central Index Key:

Registered Agent Information

Name: ROBERT K. SPARKS	Address 1: 7424 W SAHARA AVE
Address 2:	City: LAS VEGAS
State: NV	Zip Code: 89117
Phone:	Fax:
Mailing Address 1:	Mailing Address 2:
Mailing City:	Mailing State: NV
Mailing Zip Code:	
Agent Type: Noncommercial Registered Agent	

[View all business entities under this registered agent](#)

Financial Information

No Par Share Count: 0	Capital Amount: \$ 650,000.00
Par Share Count: 12,500,000.00	Par Share Value: \$ 0.01
Par Share Count: 52,500,000.00	Par Share Value: \$ 0.01

Include Inactive Officers

President - MYKALAI KONTILAI			
Address 1:	3565 LAS VEGAS BLVD SOUTH #337	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89109	Country:	
Status:	Active	Email:	
Secretary - MYKALAI KONTILAI			
Address 1:	3565 LAS VEGAS BLVD SOUTH 337	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89109	Country:	
Status:	Active	Email:	
Treasurer - MYKALAI KONTILAI			
Address 1:	3565 LAS VEGAS BLVD SOUTH #337	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89109	Country:	
Status:	Active	Email:	
Director - MYKALAI KONTILAI			
Address 1:	3565 LAS VEGAS BLVD SOUTH #337	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89109	Country:	
Status:	Active	Email:	
Director - OMAR LICEAGA			
Address 1:	566 TAM O'SHANTER	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89109	Country:	
Status:	Active	Email:	
Director - ADRIANA SANCHEZ			
Address 1:	566 TAM O'SHANTER	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89109	Country:	
Status:	Active	Email:	

- Actions\Amendments

[Click here to view 18 actions\amendments associated with this company](#)

EXHIBIT B

EXHIBIT B

Motor Vehicle Record

Source Information

Coverage Begin Date: 01/01/2000
Information Current Through: 06/05/2018
Database Last Updated: 06/22/2018
Update Frequency: 2X MONTHLY
Current Date: 07/02/2018
Source: DEPT. OF MOTOR VEHICLES

Vehicle Information

VIN: 1LNHM83W34Y684308
Vehicle Type: PASSENGER CAR
Model Year: 2004
Make: LINCOLN
Body Style: SEDAN 4D 6P
Model/Series: TOWN CAR ULTIMATE

Registration Information

Registration Renewal Date: 03/08/2018
Expiration Date: 03/05/2019
Registrant(s) Since: 04/13/2013
Name: KONTILAI, MYKALAI
Interest: REGISTRANT
Mailing Address: 566 TAM O SHANTER
LAS VEGAS, NV 89109-1494

County: CLARK

Title Information:

Original Title Date: 03/01/2013
Title Number: NV005984377 4
Name: KONTILAI, MYKALAI

Motor Vehicle: KONTILAI, MYKALAI

Interest: OWNER
Title Transaction Date: 03/01/2013
Mailing Address: 3565 LAS VEGAS BLVD S 337
LAS VEGAS, NV 89109-8919

County: CLARK

Historical DMV Record 1
Registration Renewal Date: 03/01/2017

Expiration Date: 03/05/2018

Name: KONTILAI, MYKALAI

Interest: REGISTRANT

Mailing Address: 566 TAM O SHANTER
LAS VEGAS, NV 89109-1494

County: CLARK

Historical DMV Record 2
Registration Renewal Date: 03/02/2016

Expiration Date: 03/05/2017

Issuing State: NV

Previous Plate State: NV

Name: KONTILAI, MYKALAI

Interest: REGISTRANT

Mailing Address: 3565 LAS VEGAS BLVD S
LAS VEGAS, NV 89109-8919

County: CLARK

Historical DMV Record 3
Registration Renewal Date: 03/16/2015

Expiration Date: 03/05/2016

Issuing State: NV

Previous Plate State: NV

Name: KONTILAI, MYKALAI

Interest: REGISTRANT
Mailing Address: 3565 LAS VEGAS BLVD S
LAS VEGAS, NV 89109-8919

County: CLARK

Historical DMV Record 4
Registration Renewal Date: 03/05/2014
Expiration Date: 03/05/2015
Issuing State: NV
Previous Plate State: NV
Name: KONTILAI, MYKALAI
Interest: REGISTRANT
Mailing Address: 3565 LAS VEGAS BLVD S
LAS VEGAS, NV 89109-8919

County: CLARK

Historical DMV Record 5
Registration Renewal Date: 08/17/2013
Expiration Date: 02/02/2014
Issuing State: NV
Previous Plate State: NV
Name: KONTILAI, MYKALAI
Interest: REGISTRANT
Mailing Address: 3565 LAS VEGAS BLVD S
LAS VEGAS, NV 89109-8919

County: CLARK

Historical DMV Record 6
Registration Renewal Date: 06/06/2012
Expiration Date: 06/28/2013
Issuing State: NV

Motor Vehicle: KONTILAI, MYKALAI

Previous Plate State: NV
Name: BYRON D. FORD
Interest: REGISTRANT
Mailing Address: 2091 COTTON VALLEY ST
HENDERSON, NV 89052-7141

County: CLARK

Historical DMV Record 7
Registration Renewal Date: 05/31/2011

Expiration Date: 06/28/2012

Issuing State: NV

Previous Plate State: NV

Name: BYRON D. FORD

Interest: REGISTRANT

Mailing Address: 2091 COTTON VALLEY ST
HENDERSON, NV 89052-7141

County: CLARK

Historical DMV Record 8
Registration Renewal Date: 06/02/2010

Expiration Date: 06/28/2011

Issuing State: NV

Previous Plate State: NV

Name: BYRON D. FORD

Interest: REGISTRANT

Mailing Address: 2091 COTTON VALLEY ST
HENDERSON, NV 89052-7141

County: CLARK

Historical DMV Record 9
Registration Renewal Date: 06/02/2009

Expiration Date: 06/28/2010

Motor Vehicle: KONTILAI, MYKALAI

Issuing State: NV
Previous Plate State: NV
Name: BYRON D. FORD
Interest: REGISTRANT
Mailing Address: 2091 COTTON VALLEY ST
HENDERSON, NV 89052-7141

County: CLARK

**Historical DMV Record 10
Registration Renewal Date:** 06/06/2008
Expiration Date: 06/28/2009
Issuing State: NV
Previous Plate State: NV
Name: BYRON D. FORD
Interest: REGISTRANT
Mailing Address: 2091 COTTON VALLEY ST
HENDERSON, NV 89052-7141

County: CLARK

**Historical DMV Record 11
Registration Renewal Date:** 05/25/2007
Expiration Date: 06/28/2008
Issuing State: NV
Previous Plate State: NV
Name: BYRON D. FORD
Interest: REGISTRANT
Mailing Address: 2091 COTTON VALLEY ST
HENDERSON, NV 89052-7141

County: CLARK

Historical DMV Record 12

Motor Vehicle: KONTILAI, MYKALAI

Registration Renewal Date: 06/20/2006
Expiration Date: 06/28/2007
Issuing State: NV
Name: BYRON D. FORD
Interest: REGISTRANT
Mailing Address: 44 DESERT HIGHLANDS DR
HENDERSON, NV 89052-6521

County: CLARK

**Historical DMV Record 13
Registration Renewal Date:** 06/24/2005
Expiration Date: 06/28/2006
Issuing State: NV
Name: BYRON D. FORD
Interest: REGISTRANT
Mailing Address: 44 DESERT HIGHLANDS DR
HENDERSON, NV 89052-6521

County: CLARK

**Historical DMV Record 14
Title Transfer Date:** 07/22/2004
Name: FORD MOTOR CREDIT
Interest: LIEN HOLDER
Mailing Address: PO BOX 105704
105704
ATLANTA, GA 30348-5704

County: FULTON
Title Transfer Date: 07/22/2004
Name: BYRON D. FORD
Interest: OWNER
Mailing Address: 44 DESERT HIGHLANDS DR

Motor Vehicle: KONTILAI, MYKALAI

HENDERSON, NV 89052-6521

County:

CLARK

Thomson Reuters Legal is not a consumer reporting agency and none of its services or the data contained therein constitute a 'consumer report' as such term is defined in the Federal Fair Credit Reporting Act (FCRA), 15 U.S.C. sec. 1681 et seq. The data provided to you may not be used as a factor in consumer debt collection decisioning, establishing a consumer's eligibility for credit, insurance, employment, government benefits, or housing, or for any other purpose authorized under the FCRA. By accessing one of our services, you agree not to use the service or data for any purpose authorized under the FCRA or in relation to taking an adverse action relating to a consumer application.

End of Document

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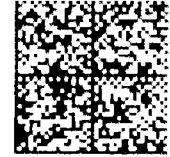
EXHIBIT C

EXHIBIT C

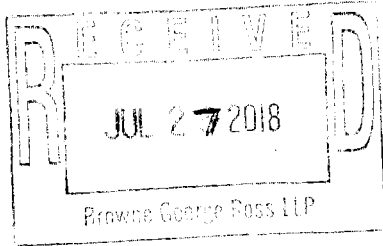
Lori Brody
2121 Avenue of the Stars
Suite 2800
Los Angeles, California 90067



7017 0530 0000 3180 1299



71100-001
UNITED STATES POSTAGE
02 1P
0003201307
MAILED FROM ZIP

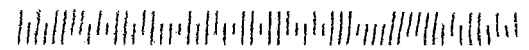


Mykalai Kontilai
3565 Las Vegas Blvd. South
337
Las Vegas, Nevada 89109

R/S

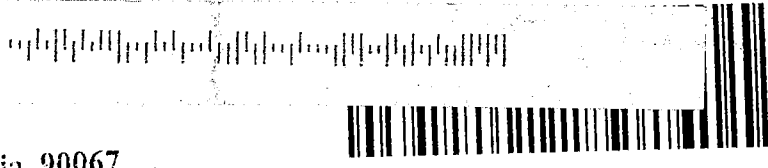
NIXIE 891095214-1N 07/24/18

RETURN TO SENDER
UNABLE TO FORWARD
UNABLE TO FORWARD
RETURN TO SENDER



UTE

Lori Brody
2121 Avenue of the Stars
Suite 2800
Los Angeles, California 90067



7015 0640 0000 0945 3381



7700-001

RECEIVED

AUG 06 2018

Browne George Ross

0107/29/18
851 AZ 1
RETURN TO SENDER
INSUFFICIENT ADDRESS
UNABLE TO FORWARD
2104NZ10112-00827
MANUAL PROC REQ

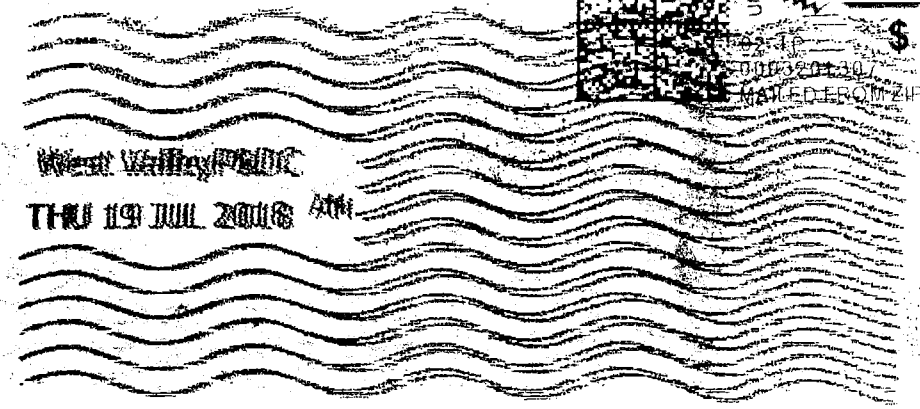
~~Mykalai Kontilai
566 Tam O Shanter
Las Vegas, Nevada 89109~~

IA

1010
AUG 6 2018
Browne George Ross LLP

Lori B
2121 A
Suite 2
Los Al

BC: 90067505200 2104N206035-00035
RETURN TO SENDER
ATTEMPTED - NOT KNOWN
UNABLE TO FORWARD
NIXIE 851 CE 1 0107/24/18



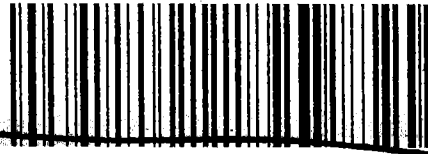
BC: 8910946410 DUZ104N20005-00035
UNABLE TO FORWARD
851 CE 1 0107/24/18
PROPERTY TOWER SUITES
145 E. HARMON AVE., UNIT 10-814
LAS VEGAS, NEVADA 89109

RECEIVED
~~Return To Sender~~
~~Return To Sender~~
~~Return To Sender~~

RECEIVED
JUL 27 2018
Browne George Ross LLP

We do not
accept Certified
Mail

Lori Brody
2121 Avenue of the Stars
Suite 2800
Los Angeles, California 90067



7015 0640 0000 0945 7709



ANK

Mykalai Kontilai
3722 Los Vegas Blvd. South
Unit 2502

BC: 90067505200
2104N210110-01038
RETURN TO SENDER
ATTEMPTED TO FORWARD
UNABLE TO NOT KNOWN
0007/29/18
851 FZ 1
NIXIE

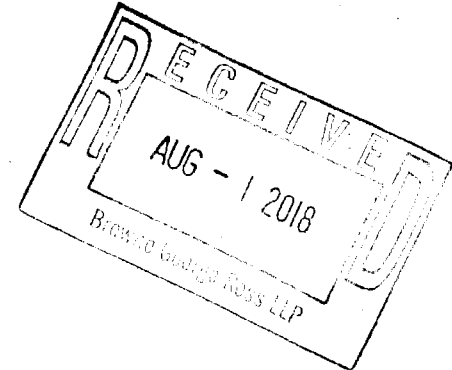


EXHIBIT 2

EXHIBIT 2

AFFIDAVIT OF NON-SERVICE

**UNITED STATES DISTRICT COURT
Central District of California**

Case Number: 2:18-CV-05190-DSF-
PLA

Plaintiff:
MEHRDAD TAGHDIRI, an individual

vs.

Defendants:
**MYKALAI KONTILAI, an individual; and COLLECTORS COFFEE, INC., a
Nevada corporation**

Received by Ace Attorney Service, Inc. (Los Angeles) on the 14th day of June, 2018 at 1:11 pm to be served on MYKALAI KONTILAI, 3565 Las Vegas Blvd. South, Suite #337, Las Vegas, NV 89109.

I, Anthony Spada, being duly sworn, depose and say that on the 17th day of July, 2018 at 4:14 pm, I:

NON-SERVED the SUMMONS IN A CIVIL ACTION, CIVIL COVER SHEET, COMPLAINT, CERTIFICATION AND NOTICE OF INTERESTED PARTIES, NOTICE OF ASSIGNMENT TO UNITED STATES JUDGES, NOTICE TO PARTIES OF COURT-DIRECTED ADR PROGRAM and STANDING ORDER FOR CASES ASSIGNED TO JUDGE DALE S. FISCHER for the reasons detailed in the comments below.

Additional Information pertaining to this Service:

6/15/2018 1:11 pm Attempted service was made at the address of 3565 Las Vegas Blvd. South, Suite #337, Las Vegas, NV 89109. This is a commercial address. The business tenant is The UPS Store; a mail box and shipping business. The staffer could not provide information regarding previous or current customers.

6/15/2018 1:29 pm Attempted service was made at the address of 566 Tam O Shanter, Las Vegas, NV 89109. This address is within a guard gated condo community. A guard escort was received. No response was received at the door. No lights were observed within the residence. A dog was heard barking within the residence. No vehicle was observed.

6/16/2018 11:42 am Attempted service was made at the address of 566 Tam O Shanter, Las Vegas, NV 89109. This address is within a guard gated condo community. A guard escort was received. No response was received at the door. No lights were observed within the residence. A dog was heard barking within the residence. No vehicle was observed. The guard confirmed that the Kontilai's are listed on the community database as occupying this residence.

6/18/2018 8:00 am Attempted service was made at the address of 566 Tam O Shanter, Las Vegas, NV 89109. This address is within a guard gated condo community. A guard escort was received. No response was received at the door. No lights were observed within the residence. A dog was heard barking within the residence. No vehicle was observed.

6/19/2018 7:29 pm Attempted service was made at the address of 566 Tam O Shanter, Las Vegas, NV 89109. This address is within a guard gated condo community. A guard escort was received. No response was received at the door. No lights were observed within the residence. A dog was heard barking within the residence. No vehicle was observed.

7/11/2018 7:38 pm Attempted service was made at the address of 566 Tam O Shanter, Las Vegas, NV 89109. This address is within a guard gated condo community. A guard escort was received. No response was received at the door. Observed lights within the residence. A dog was heard barking within the



AFFIDAVIT OF NON-SERVICE For 2:18-CV-05190-DSF-PLA

residence. No vehicle was observed.

7/12/2018 9:18 am Attempted service was made at the address of 145 E. Harmon Avenue, Unit 10-814, Las Vegas, NV 89109. This address is a high rise community having 3 buildings. The concierge in building 1 could not assist and stated that security was not available to assist.

7/12/2018 10:14 am Attempted service was made at the address of 3722 Las Vegas Blvd. South, Unit 3502, Las Vegas, NV 89158. This address is a luxury high rise living community. The concierge (white, female, 25 y/o, 5'5", 130 lbs., brown hair, no glasses) was unable to provide information regarding tenants and guests.

7/16/2018 11:46 am Attempted service was made at the address of 145 E. Harmon Avenue, Unit 10-814, Las Vegas, NV 89109. This address is a high rise community having 3 buildings. The concierge in building 1 could not assist and stated that security was not available to assist.

7/16/2018 12:38 pm Attempted service was made at the address of 3722 Las Vegas Blvd. South, Unit 3502, Las Vegas, NV 89158. This address is a luxury high rise living community. The concierge (white, male, 30 y/o, 6'0", 200 lbs., brown hair, no glasses) was unable to provide information regarding tenants and guests.

7/17/2018 3:42 pm Attempted service was made at the address of 145 E. Harmon Avenue, Unit 10-814, Las Vegas, NV 89109. Doris (black, female, 35 y/o, sitting, brown hair, no glasses), Residential Services, stated that Mykalai Kontilai did not live at this community.

7/17/2018 4:14 pm Attempted service was made at the address of 3722 Las Vegas Blvd. South, Unit 3502, Las Vegas, NV 89158. This address is a luxury high rise living community. The Conierge, Marie (Hispanic, female, 30 y/o, 5'4", 145 lbs., brown hair, no glasses) stated that Mykalai Kontilai did not live in this community.


I certify that at all times herein Affiant was and is a citizen of the United States, over 18 years of age, and not a party to or interested in the proceeding in which this affidavit is made.

State of Nevada
County of Clark

Subscribed and Sworn to before me on the 3rd
day of August, 2018 by the affiant
who is personally known to me.



NOTARY PUBLIC



Anthony Spada
R-045877

Ace Attorney Service, Inc. (Los Angeles)
811 Wilshire Boulevard, Suite 900
Los Angeles, CA 90017
(213) 623-3979

Our Job Serial Number: BRT-2018002016
Ref: 1584528



EXHIBIT 3

EXHIBIT 3

AFFIDAVIT OF DUE DILIGENCE

State of Nevada

United States District Court

Case Number: 2:18-CV-01475-RFB-VCF

Plaintiff:

MEHRDAD TAGHDIRI, an individual

vs.

Defendants:

MYKALAI KONTILAI, an individual; and COLLECTORS COFFEE, INC., a Nevada corporation

Received by Bullet Legal Services on the 13th day of September, 2018 at 4:29 pm to be served on **MYKALAI KONTILAI, 566 Tam O'Shanter, Las Vegas, NV 89109.**

I, Anthony Spada, being duly sworn, depose and say that on the **27th day of September, 2018 at 4:47 pm,** I:

NON-SERVED the SUMMONS IN A CIVIL ACTION, CERTIFICATION AND NOTICE OF INTERESTED PARTIES and COMPLAINT. After due search, careful inquiry and diligent attempts was unable to serve on **MYKALAI KONTILAI** for the reasons detailed in the comments below.

Additional Information pertaining to this Service:

9/14/2018 2:32 pm Attempted service was made at the address of 566 Tam O'Shanter, Las Vegas, NV 89109. This address is within a guard gated community. A guard escort was received. The guard stated that Mykalai Kontilai owns the property but does not know if he lives there. She knows that a female lives at the address. The guard stated that surveillance is not allowed within the community. The Affiant received a response at the door. Maria (Hispanic, female, 65 y/o, 5'5', 150 lbs., grey hair, no glasses) stated that she has been renting this residence for approximately 2 years. She pays her rent to a property management company. Maria did not know the Kontilai's. Maria did not match the provided photograph. Observed two vehicles parked in the proximity of the residence: Nevada plate 925YDX and Nevada specialty plate US 914A.

9/17/2018 8:13 am Attempted service was made at the address of 566 Tam O'Shanter, Las Vegas, NV 89109. This address is within a guard gated community. A guard escort was received. Observed two vehicles parked in the proximity of the residence: Nevada plate 925YDX and Nevada specialty plate US 914A.

9/19/2018 7:13 pm Attempted service was made at the address of 566 Tam O'Shanter, Las Vegas, NV 89109. This address is within a guard gated community. A guard escort was received. Observed two vehicles parked in the proximity of the residence: Nevada plate 925YDX and Nevada specialty plate US 914A.

9/20/2018 11:01 am Attempted service was made at the address of 566 Tam O'Shanter, Las Vegas, NV 89109. This address is within a guard gated community. A guard escort was received. Observed two vehicles parked in the proximity of the residence: Nevada plate 925YDX and Nevada specialty plate US 914A.

9/25/2018 10:03 am Attempted service was made at the address of Collector's Cafe/Collectors Coffee, 400 S. 4th Street, Las Vegas, NV 89101. This is a commercial address. A unit number was missing for this address. The building directory did not contain the name of Collector's Cafe/Collectors Coffee. The security guard (white, 65 y/o, sitting grey hair, no glasses) stated that Collector's Cafe one occupied a space on the first floor approximately 4 years ago. He stated that is as a space where collector met to trade. The guard believes Collector's Cafe went out of business. No additional information was available.



AFFIDAVIT OF DUE DILIGENCE For 2:18-CV-01475-RFB-VCF

9/27/2018 4:47 pm Attempted service was made at the address of Collector's Cafe/Collectors Coffee, 8020 Las Vegas Blvd. South, Las Vegas, NV 89123. This is commercial address. The business tenant is Smartstop Self Storage, (888) 79-storage: storage facility with mailboxes. The staffer (white, female, 50 y/o, sitting, glasses) confirmed that Mykalai Kontilai and Collector's Cafe had a mailbox at this location. She stated that she is authorized to sign for all packages. She did not provide the mailbox number.

I certify that at all times herein Affiant was and is a citizen of the United States, over 18 years of age, and not a party to or interested in the proceeding in which this affidavit is made.

State of Nevada
County of Clark

Subscribed and sworn to before me on the 4th
day of October, 2018 by the affiant
who is personally known to me.



NOTARY PUBLIC



Anthony Spada
R-045877

Bullet Legal Services
1930 Village Center Circle, #3-965
Las Vegas, NV 89134
(702) 823-1000

Our Job Serial Number: BRT-2018003017

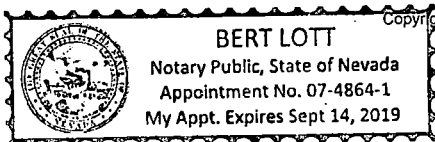


EXHIBIT 4

EXHIBIT 4

AFFIDAVIT OF DUE DILIGENCE

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA
CLARK COUNTY, STATE OF NEVADA

MEHRDAD TAGHDIRI, an individual,

Plaintiff(s)

v.

MYKALAI KONTILAI, an individual; et al.,

Defendant(s)

Case No.: 2:18-cv-01475-RFB-VCF
Charles H. McCrea, Esq., Bar No. 104
Hejmanowski & McCrea LLC
520 S. 4th Street, Suite 320
Las Vegas, NV 89101
(702) 834-8777
Attorneys for the Plaintiff
Client File# 1662-0001 CHM

I, Judith Mae All, being sworn, states: That I am a licensed process server registered in Nevada. I received a copy of the Summons in a Civil Action; Complaint, from Hejmanowski & McCrea LLC

That attempts were made to serve Mykalai Kontilai with Summons in a Civil Action; Complaint, at:

Attempted at 566 Tam O'Shanter, Las Vegas, NV 89109 On 9/14/2018 at 5:46 PM
Results: Guard gated community. Roving guard met at property and stayed in his car while I went to door. No answer, quiet, wheelchair on porch, camera at door. Silver Cadillac Town Car - Nevada Plate number 925YDX parked in space #566.

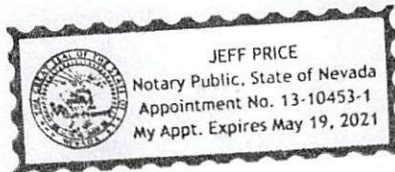
Attempted at 566 Tam O'Shanter, Las Vegas, NV 89109 On 9/15/2018 at 3:17 PM
Results: Guard gated community, no escort available, but allowed access. SPOKE WITH: Maria Perez (Latino, Female, 60's 5'7", 170 lbs., Gray hair, Brown eyes). She stated that she does not know Mykalai Kontilai, insists he does not reside at this residence.


I being duly sworn, states: that all times herein, Affiant was and is over 18 years of age, not a party to or interested in the proceedings in which this Affidavit is made. I declare under perjury that the foregoing is true and correct.


Judith Mae All
Registered Work Card# R-040570
State of Nevada

State of: NEVADA
County of: CLARK

Subscribed and sworn before me, a
Notary Public, this 3RD day of
OCTOBER 2018



BY: Judith Mae All

Jeffrey Price
Notary Public
My Commission expires on: 5/19/2021



Service Provided for:
Nationwide Legal Nevada, LLC
626 S. 7th Street
Las Vegas, NV 89101
(702) 385-5444
Nevada Lic # 1656

EXHIBIT 1

EXHIBIT 1

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DECLARATION OF LORI SAMBOL BRODY

I, Lori Sambol Brody, declare and state as follows:

1. I am an attorney at law, duly admitted to practice before this Court and all courts of the State of California. I am an associate with Browne George Ross LLP, counsel of record for Plaintiff Mehrdad Taghdiri in this matter. I have firsthand, personal knowledge of the facts set forth below and if called as a witness could competently testify thereto.

2. This action was filed in the United States District Court for the Central District of California on June 12, 2018.

3. We have made numerous attempts to serve defendant Mykalai Kontilai with the initial California summons and complaint, which are described in more detail in the concurrently filed declarations of Ace Legal and Bullet Legal Services.

Initial Attempts at Service

4. I conducted a business records search for the other defendant in the case, Collector's Coffee, Inc., through the Nevada Secretary of State website. Mr. Kontilai was listed as an officer of Collector's Coffee, Inc., and his address was given as:

3565 Las Vegas Blvd. #337
Las Vegas, NV 89109

A true and correct copy of the information from the Nevada Secretary of State website (last accessed October 3, 2018) is attached hereto as Exhibit A.

5. Because I suspected that the address in paragraph 4 was a post office box, a Westlaw search was conducted, on my instruction and supervision, to determine other potential current addresses for Mr. Kontilai. We found the following potential current address:

566 Tam O Shanter
Las Vegas, NV 89109

This address was obtained from the Department of Motor Vehicles records as a mailing address for the most recent registration for Mr. Kontilai's automobile. A true and correct copy of the portion of the Westlaw printout showing that address is attached as Exhibit B. (Note also that Secretary of State printout attached as Exhibit A states that two directors of Collector's Coffee – Omar Liceaga and Adriana Sanchez – reside at the Tam O Shanter address.)

1 3722 Las Vegas Blvd. South, Unit 3502
2 Las Vegas, NV 89158

3 10. All of the envelopes were returned to us unopened with the return receipt card
4 unsigned in late July 2018 and early August 2018. Copies of the four envelopes are attached as
5 Exhibit C.

6 **Additional Attempts**

7 11. On August 7, 2018, Judge Dale S. Fischer for the United States District Court for
8 the Central District of California ordered this action to be transferred from the Central District of
9 California to the District of Nevada. On September 1, 2018, the District of Nevada issued a
10 summons for Mr. Kontilai.

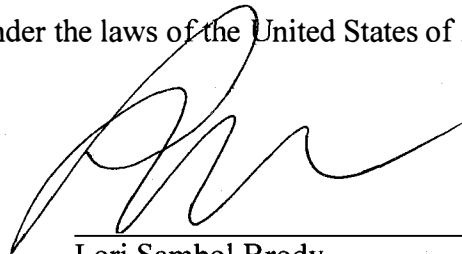
11 12. I consulted with another private investigator, Omar Rodriguez at Pivotal
12 Investigations. Mr. Rodriguez concluded that the Tam O Shanter address was most likely the
13 current address of Mr. Kontilai and his wife. He also informed me that an entity named
14 Collector's Café, owned by Mr. Kontilai, was located at 400 S. 4th Street, Las Vegas, CA 89101.

15 13. Therefore, on September 13, 2018, I requested a process server, Bullet Legal
16 Services, to again attempt to serve Mr. Kontilai at the Tam O Shanter address. The process server
17 informed me that he was told that Mr. Kontilai did not live at that address.

18 14. On September 24, 2018, I requested that Bullet Legal Services attempt to serve Mr.
19 Kontilai at the 400 S. 4th Street address for Collector's Café, and another address I had found in
20 recent insurance documents for Collector's Coffee, 8020 Las Vegas Blvd. South, Las Vegas, NV
21 89123. The process server informed me that Collector's Café was not at the first address and that
22 Mr. Kontilai and Collector's Café had a mailbox at the second address.

23 Executed this 3d day of October 2018, at Los Angeles, California.

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

26 

27 _____
Lori Sambol Brody

EXHIBIT A

EXHIBIT A

NEVADA SECRETARY OF STATE

Barbara K. Cegavske

Search nvsos.gov...

[SOS INFORMATION](#) | [ELECTIONS](#) | [BUSINESSES](#) | [LICENSING](#) | [INVESTOR INFORMATION](#) | [ONLINE SERVICES](#)

[My Data Reports](#) [Commercial Recordings](#) [Licensing](#)

COLLECTOR'S COFFEE, INC.

[Manage this Business](#)

Business Entity Information

Status: Active	File Date: 11/1/2007
Type: Domestic Corporation	Entity Number: E0754932007-3
Qualifying State: NV	List of Officers Due: 11/30/2018
Managed By:	Expiration Date:
NV Business ID: NV20071411377	Business License Exp: 11/30/2018

Additional Information

Central Index Key:

Registered Agent Information

Name: ROBERT K. SPARKS	Address 1: 7424 W SAHARA AVE
Address 2:	City: LAS VEGAS
State: NV	Zip Code: 89117
Phone:	Fax:
Mailing Address 1:	Mailing Address 2:
Mailing City:	Mailing State: NV
Mailing Zip Code:	
Agent Type: Noncommercial Registered Agent	

[View all business entities under this registered agent](#)

Financial Information

No Par Share Count: 0	Capital Amount: \$ 650,000.00
Par Share Count: 12,500,000.00	Par Share Value: \$ 0.01
Par Share Count: 52,500,000.00	Par Share Value: \$ 0.01

Include Inactive Officers

President - MYKALAI KONTILAI			
Address 1:	3565 LAS VEGAS BLVD SOUTH #337	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89109	Country:	
Status:	Active	Email:	
Secretary - MYKALAI KONTILAI			
Address 1:	3565 LAS VEGAS BLVD SOUTH 337	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89109	Country:	
Status:	Active	Email:	
Treasurer - MYKALAI KONTILAI			
Address 1:	3565 LAS VEGAS BLVD SOUTH #337	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89109	Country:	
Status:	Active	Email:	
Director - MYKALAI KONTILAI			
Address 1:	3565 LAS VEGAS BLVD SOUTH #337	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89109	Country:	
Status:	Active	Email:	
Director - OMAR LICEAGA			
Address 1:	566 TAM O'SHANTER	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89109	Country:	
Status:	Active	Email:	
Director - ADRIANA SANCHEZ			
Address 1:	566 TAM O'SHANTER	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89109	Country:	
Status:	Active	Email:	

- Actions\Amendments

[Click here to view 18 actions\amendments associated with this company](#)

EXHIBIT B

EXHIBIT B

Motor Vehicle Record

Source Information

Coverage Begin Date: 01/01/2000
Information Current Through: 06/05/2018
Database Last Updated: 06/22/2018
Update Frequency: 2X MONTHLY
Current Date: 07/02/2018
Source: DEPT. OF MOTOR VEHICLES

Vehicle Information

VIN: 1LNHM83W34Y684308
Vehicle Type: PASSENGER CAR
Model Year: 2004
Make: LINCOLN
Body Style: SEDAN 4D 6P
Model/Series: TOWN CAR ULTIMATE

Registration Information

Registration Renewal Date: 03/08/2018
Expiration Date: 03/05/2019
Registrant(s) Since: 04/13/2013
Name: KONTILAI, MYKALAI
Interest: REGISTRANT
Mailing Address: 566 TAM O SHANTER
LAS VEGAS, NV 89109-1494

County: CLARK

Title Information:

Original Title Date: 03/01/2013
Title Number: NV005984377 4
Name: KONTILAI, MYKALAI

Motor Vehicle: KONTILAI, MYKALAI

Interest: OWNER
Title Transaction Date: 03/01/2013
Mailing Address: 3565 LAS VEGAS BLVD S 337
LAS VEGAS, NV 89109-8919

County: CLARK

Historical DMV Record 1
Registration Renewal Date: 03/01/2017

Expiration Date: 03/05/2018

Name: KONTILAI, MYKALAI

Interest: REGISTRANT

Mailing Address: 566 TAM O SHANTER
LAS VEGAS, NV 89109-1494

County: CLARK

Historical DMV Record 2
Registration Renewal Date: 03/02/2016

Expiration Date: 03/05/2017

Issuing State: NV

Previous Plate State: NV

Name: KONTILAI, MYKALAI

Interest: REGISTRANT

Mailing Address: 3565 LAS VEGAS BLVD S
LAS VEGAS, NV 89109-8919

County: CLARK

Historical DMV Record 3
Registration Renewal Date: 03/16/2015

Expiration Date: 03/05/2016

Issuing State: NV

Previous Plate State: NV

Name: KONTILAI, MYKALAI

Interest: REGISTRANT

Mailing Address: 3565 LAS VEGAS BLVD S
LAS VEGAS, NV 89109-8919

County: CLARK

**Historical DMV Record 4
Registration Renewal Date:** 03/05/2014

Expiration Date: 03/05/2015

Issuing State: NV

Previous Plate State: NV

Name: KONTILAI, MYKALAI

Interest: REGISTRANT

Mailing Address: 3565 LAS VEGAS BLVD S
LAS VEGAS, NV 89109-8919

County: CLARK

**Historical DMV Record 5
Registration Renewal Date:** 08/17/2013

Expiration Date: 02/02/2014

Issuing State: NV

Previous Plate State: NV

Name: KONTILAI, MYKALAI

Interest: REGISTRANT

Mailing Address: 3565 LAS VEGAS BLVD S
LAS VEGAS, NV 89109-8919

County: CLARK

**Historical DMV Record 6
Registration Renewal Date:** 06/06/2012

Expiration Date: 06/28/2013

Issuing State: NV

Motor Vehicle: KONTILAI, MYKALAI

Previous Plate State: NV
Name: BYRON D. FORD
Interest: REGISTRANT
Mailing Address: 2091 COTTON VALLEY ST
HENDERSON, NV 89052-7141

County: CLARK

Historical DMV Record 7
Registration Renewal Date: 05/31/2011

Expiration Date: 06/28/2012

Issuing State: NV

Previous Plate State: NV

Name: BYRON D. FORD

Interest: REGISTRANT

Mailing Address: 2091 COTTON VALLEY ST
HENDERSON, NV 89052-7141

County: CLARK

Historical DMV Record 8
Registration Renewal Date: 06/02/2010

Expiration Date: 06/28/2011

Issuing State: NV

Previous Plate State: NV

Name: BYRON D. FORD

Interest: REGISTRANT

Mailing Address: 2091 COTTON VALLEY ST
HENDERSON, NV 89052-7141

County: CLARK

Historical DMV Record 9
Registration Renewal Date: 06/02/2009

Expiration Date: 06/28/2010

Motor Vehicle: KONTILAI, MYKALAI

Issuing State: NV
Previous Plate State: NV
Name: BYRON D. FORD
Interest: REGISTRANT
Mailing Address: 2091 COTTON VALLEY ST
HENDERSON, NV 89052-7141

County: CLARK

**Historical DMV Record 10
Registration Renewal Date:** 06/06/2008
Expiration Date: 06/28/2009
Issuing State: NV
Previous Plate State: NV
Name: BYRON D. FORD
Interest: REGISTRANT
Mailing Address: 2091 COTTON VALLEY ST
HENDERSON, NV 89052-7141

County: CLARK

**Historical DMV Record 11
Registration Renewal Date:** 05/25/2007
Expiration Date: 06/28/2008
Issuing State: NV
Previous Plate State: NV
Name: BYRON D. FORD
Interest: REGISTRANT
Mailing Address: 2091 COTTON VALLEY ST
HENDERSON, NV 89052-7141

County: CLARK

Historical DMV Record 12

Motor Vehicle: KONTILAI, MYKALAI

Registration Renewal Date: 06/20/2006
Expiration Date: 06/28/2007
Issuing State: NV
Name: BYRON D. FORD
Interest: REGISTRANT
Mailing Address: 44 DESERT HIGHLANDS DR
HENDERSON, NV 89052-6521

County: CLARK
**Historical DMV Record 13
Registration Renewal Date:** 06/24/2005
Expiration Date: 06/28/2006
Issuing State: NV
Name: BYRON D. FORD
Interest: REGISTRANT
Mailing Address: 44 DESERT HIGHLANDS DR
HENDERSON, NV 89052-6521

County: CLARK
**Historical DMV Record 14
Title Transfer Date:** 07/22/2004
Name: FORD MOTOR CREDIT
Interest: LIEN HOLDER
Mailing Address: PO BOX 105704
105704
ATLANTA, GA 30348-5704

County: FULTON
Title Transfer Date: 07/22/2004
Name: BYRON D. FORD
Interest: OWNER
Mailing Address: 44 DESERT HIGHLANDS DR

Motor Vehicle: KONTILAI, MYKALAI

HENDERSON, NV 89052-6521

County:

CLARK

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End of Document

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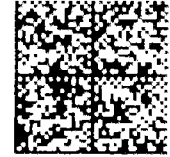
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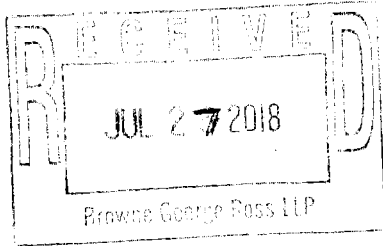
Lori Brody
2121 Avenue of the Stars
Suite 2800
Los Angeles, California 90067



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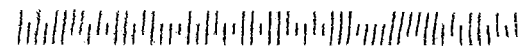


Mykalai Kontilai
3565 Las Vegas Blvd. South
337
Las Vegas, Nevada 89109

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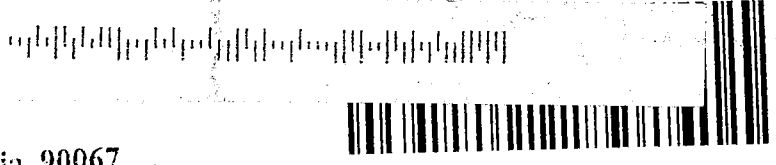
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Lori Brody
2121 Avenue of the Stars
Suite 2800
Los Angeles, California 90067



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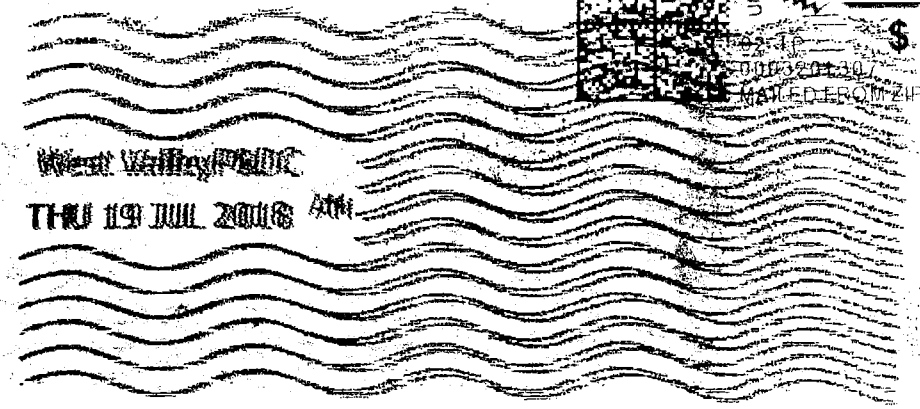
~~Mykalai Kontilai
566 Tam O Shanter
Las Vegas, Nevada 89109~~

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Lori B
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PROPERTY TOWER SUITES
145 E. HARMON AVE., UNIT 10-814
LAS VEGAS, NEVADA 89109

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RECEIVED
JUL 27 2018
Browne George Ross LLP

We do not
accept Certified
Mail

Lori Brody
2121 Avenue of the Stars
Suite 2800
Los Angeles, California 90067



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ANK

Mykalai Kontilai
3722 Los Vegas Blvd. South
Unit 2502

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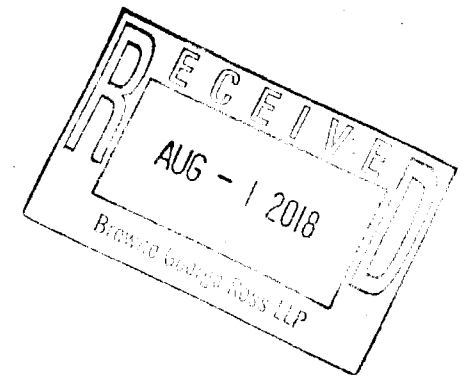


EXHIBIT 2

EXHIBIT 2

AFFIDAVIT OF NON-SERVICE

**UNITED STATES DISTRICT COURT
Central District of California**

Case Number: 2:18-CV-05190-DSF-
PLA

Plaintiff:
MEHRDAD TAGHDIRI, an individual

vs.

Defendants:
**MYKALAI KONTILAI, an individual; and COLLECTORS COFFEE, INC., a
Nevada corporation**

Received by Ace Attorney Service, Inc. (Los Angeles) on the 14th day of June, 2018 at 1:11 pm to be served on MYKALAI KONTILAI, 3565 Las Vegas Blvd. South, Suite #337, Las Vegas, NV 89109.

I, Anthony Spada, being duly sworn, depose and say that on the 17th day of July, 2018 at 4:14 pm, I:

NON-SERVED the SUMMONS IN A CIVIL ACTION, CIVIL COVER SHEET, COMPLAINT, CERTIFICATION AND NOTICE OF INTERESTED PARTIES, NOTICE OF ASSIGNMENT TO UNITED STATES JUDGES, NOTICE TO PARTIES OF COURT-DIRECTED ADR PROGRAM and STANDING ORDER FOR CASES ASSIGNED TO JUDGE DALE S. FISCHER for the reasons detailed in the comments below.

Additional Information pertaining to this Service:

6/15/2018 1:11 pm Attempted service was made at the address of 3565 Las Vegas Blvd. South, Suite #337, Las Vegas, NV 89109. This is a commercial address. The business tenant is The UPS Store; a mail box and shipping business. The staffer could not provide information regarding previous or current customers.

6/15/2018 1:29 pm Attempted service was made at the address of 566 Tam O Shanter, Las Vegas, NV 89109. This address is within a guard gated condo community. A guard escort was received. No response was received at the door. No lights were observed within the residence. A dog was heard barking within the residence. No vehicle was observed.

6/16/2018 11:42 am Attempted service was made at the address of 566 Tam O Shanter, Las Vegas, NV 89109. This address is within a guard gated condo community. A guard escort was received. No response was received at the door. No lights were observed within the residence. A dog was heard barking within the residence. No vehicle was observed. The guard confirmed that the Kontilai's are listed on the community database as occupying this residence.

6/18/2018 8:00 am Attempted service was made at the address of 566 Tam O Shanter, Las Vegas, NV 89109. This address is within a guard gated condo community. A guard escort was received. No response was received at the door. No lights were observed within the residence. A dog was heard barking within the residence. No vehicle was observed.

6/19/2018 7:29 pm Attempted service was made at the address of 566 Tam O Shanter, Las Vegas, NV 89109. This address is within a guard gated condo community. A guard escort was received. No response was received at the door. No lights were observed within the residence. A dog was heard barking within the residence. No vehicle was observed.

7/11/2018 7:38 pm Attempted service was made at the address of 566 Tam O Shanter, Las Vegas, NV 89109. This address is within a guard gated condo community. A guard escort was received. No response was received at the door. Observed lights within the residence. A dog was heard barking within the



AFFIDAVIT OF NON-SERVICE For 2:18-CV-05190-DSF-PLA

residence. No vehicle was observed.

7/12/2018 9:18 am Attempted service was made at the address of 145 E. Harmon Avenue, Unit 10-814, Las Vegas, NV 89109. This address is a high rise community having 3 buildings. The concierge in building 1 could not assist and stated that security was not available to assist.

7/12/2018 10:14 am Attempted service was made at the address of 3722 Las Vegas Blvd. South, Unit 3502, Las Vegas, NV 89158. This address is a luxury high rise living community. The concierge (white, female, 25 y/o, 5'5", 130 lbs., brown hair, no glasses) was unable to provide information regarding tenants and guests.

7/16/2018 11:46 am Attempted service was made at the address of 145 E. Harmon Avenue, Unit 10-814, Las Vegas, NV 89109. This address is a high rise community having 3 buildings. The concierge in building 1 could not assist and stated that security was not available to assist.

7/16/2018 12:38 pm Attempted service was made at the address of 3722 Las Vegas Blvd. South, Unit 3502, Las Vegas, NV 89158. This address is a luxury high rise living community. The concierge (white, male, 30 y/o, 6'0", 200 lbs., brown hair, no glasses) was unable to provide information regarding tenants and guests.

7/17/2018 3:42 pm Attempted service was made at the address of 145 E. Harmon Avenue, Unit 10-814, Las Vegas, NV 89109. Doris (black, female, 35 y/o, sitting, brown hair, no glasses), Residential Services, stated that Mykalai Kontilai did not live at this community.

7/17/2018 4:14 pm Attempted service was made at the address of 3722 Las Vegas Blvd. South, Unit 3502, Las Vegas, NV 89158. This address is a luxury high rise living community. The Conierge, Marie (Hispanic, female, 30 y/o, 5'4", 145 lbs., brown hair, no glasses) stated that Mykalai Kontilai did not live in this community.


I certify that at all times herein Affiant was and is a citizen of the United States, over 18 years of age, and not a party to or interested in the proceeding in which this affidavit is made.

State of Nevada
County of Clark

Subscribed and Sworn to before me on the 3rd
day of August, 2018 by the affiant
who is personally known to me.



NOTARY PUBLIC



Anthony Spada
R-045877

Ace Attorney Service, Inc. (Los Angeles)
811 Wilshire Boulevard, Suite 900
Los Angeles, CA 90017
(213) 623-3979

Our Job Serial Number: BRT-2018002016
Ref: 1584528



EXHIBIT 3

EXHIBIT 3

AFFIDAVIT OF DUE DILIGENCE

State of Nevada

United States District Court

Case Number: 2:18-CV-01475-RFB-VCF

Plaintiff:

MEHRDAD TAGHDIRI, an individual

vs.

Defendants:

MYKALAI KONTILAI, an individual; and COLLECTORS COFFEE, INC., a Nevada corporation

Received by Bullet Legal Services on the 13th day of September, 2018 at 4:29 pm to be served on **MYKALAI KONTILAI, 566 Tam O'Shanter, Las Vegas, NV 89109.**

I, Anthony Spada, being duly sworn, depose and say that on the **27th day of September, 2018 at 4:47 pm,** I:

NON-SERVED the SUMMONS IN A CIVIL ACTION, CERTIFICATION AND NOTICE OF INTERESTED PARTIES and COMPLAINT. After due search, careful inquiry and diligent attempts was unable to serve on **MYKALAI KONTILAI** for the reasons detailed in the comments below.

Additional Information pertaining to this Service:

9/14/2018 2:32 pm Attempted service was made at the address of 566 Tam O'Shanter, Las Vegas, NV 89109. This address is within a guard gated community. A guard escort was received. The guard stated that Mykalai Kontilai owns the property but does not know if he lives there. She knows that a female lives at the address. The guard stated that surveillance is not allowed within the community. The Affiant received a response at the door. Maria (Hispanic, female, 65 y/o, 5'5', 150 lbs., grey hair, no glasses) stated that she has been renting this residence for approximately 2 years. She pays her rent to a property management company. Maria did not know the Kontilai's. Maria did not match the provided photograph. Observed two vehicles parked in the proximity of the residence: Nevada plate 925YDX and Nevada specialty plate US 914A.

9/17/2018 8:13 am Attempted service was made at the address of 566 Tam O'Shanter, Las Vegas, NV 89109. This address is within a guard gated community. A guard escort was received. Observed two vehicles parked in the proximity of the residence: Nevada plate 925YDX and Nevada specialty plate US 914A.

9/19/2018 7:13 pm Attempted service was made at the address of 566 Tam O'Shanter, Las Vegas, NV 89109. This address is within a guard gated community. A guard escort was received. Observed two vehicles parked in the proximity of the residence: Nevada plate 925YDX and Nevada specialty plate US 914A.

9/20/2018 11:01 am Attempted service was made at the address of 566 Tam O'Shanter, Las Vegas, NV 89109. This address is within a guard gated community. A guard escort was received. Observed two vehicles parked in the proximity of the residence: Nevada plate 925YDX and Nevada specialty plate US 914A.

9/25/2018 10:03 am Attempted service was made at the address of Collector's Cafe/Collectors Coffee, 400 S. 4th Street, Las Vegas, NV 89101. This is a commercial address. A unit number was missing for this address. The building directory did not contain the name of Collector's Cafe/Collectors Coffee. The security guard (white, 65 y/o, sitting grey hair, no glasses) stated that Collector's Cafe one occupied a space on the first floor approximately 4 years ago. He stated that is as a space where collector met to trade. The guard believes Collector's Cafe went out of business. No additional information was available.




AFFIDAVIT OF DUE DILIGENCE For 2:18-CV-01475-RFB-VCF

9/27/2018 4:47 pm Attempted service was made at the address of Collector's Cafe/Collectors Coffee, 8020 Las Vegas Blvd. South, Las Vegas, NV 89123. This is commercial address. The business tenant is Smartstop Self Storage, (888) 79-storage: storage facility with mailboxes. The staffer (white, female, 50 y/o, sitting, glasses) confirmed that Mykalai Kontilai and Collector's Cafe had a mailbox at this location. She stated that she is authorized to sign for all packages. She did not provide the mailbox number.

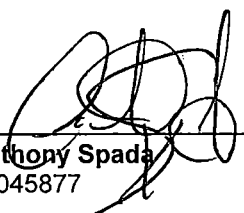
I certify that at all times herein Affiant was and is a citizen of the United States, over 18 years of age, and not a party to or interested in the proceeding in which this affidavit is made.

State of Nevada
County of Clark

Subscribed and Sworn to before me on the 4th
day of October, 2018 by the affiant
who is personally known to me.



NOTARY PUBLIC



Anthony Spada
R-045877

Bullet Legal Services
1930 Village Center Circle, #3-965
Las Vegas, NV 89134
(702) 823-1000

Our Job Serial Number: BRT-2018003017

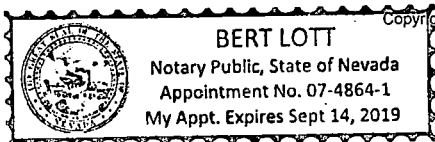


EXHIBIT 4

EXHIBIT 4

AFFIDAVIT OF DUE DILIGENCE

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA
CLARK COUNTY, STATE OF NEVADA

MEHRDAD TAGHDIRI, an individual,

Plaintiff(s)

v.

MYKALAI KONTILAI, an individual; et al.,

Defendant(s)

Case No.: 2:18-cv-01475-RFB-VCF
Charles H. McCrea, Esq., Bar No. 104
Hejmanowski & McCrea LLC
520 S. 4th Street, Suite 320
Las Vegas, NV 89101
(702) 834-8777
Attorneys for the Plaintiff
Client File# 1662-0001 CHM

I, Judith Mae All, being sworn, states: That I am a licensed process server registered in Nevada. I received a copy of the Summons in a Civil Action; Complaint, from Hejmanowski & McCrea LLC

That attempts were made to serve Mykalai Kontilai with Summons in a Civil Action; Complaint, at:

Attempted at 566 Tam O'Shanter, Las Vegas, NV 89109 On 9/14/2018 at 5:46 PM
Results: Guard gated community. Roving guard met at property and stayed in his car while I went to door. No answer, quiet, wheelchair on porch, camera at door. Silver Cadillac Town Car - Nevada Plate number 925YDX parked in space #566.

Attempted at 566 Tam O'Shanter, Las Vegas, NV 89109 On 9/15/2018 at 3:17 PM
Results: Guard gated community, no escort available, but allowed access. SPOKE WITH: Maria Perez (Latino, Female, 60's 5'7", 170 lbs., Gray hair, Brown eyes). She stated that she does not know Mykalai Kontilai, insists he does not reside at this residence.

I being duly sworn, states: that all times herein, Affiant was and is over 18 years of age, not a party to or interested in the proceedings in which this Affidavit is made. I declare under perjury that the foregoing is true and correct.

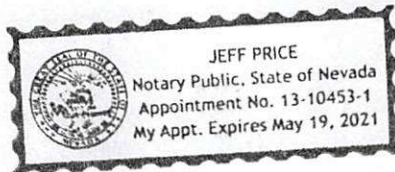
Judith Mae All

Judith Mae All
Registered Work Card# R-040570
State of Nevada

State of: NEVADA
County of: CLARK

Subscribed and sworn before me, a
Notary Public, this 3RD day of
OCTOBER 2018

BY: Judith Mae All



Jeffrey Price
Jeffrey Price
Notary Public
My Commission expires on: 5/19/2021



Service Provided for:
Nationwide Legal Nevada, LLC
626 S. 7th Street
Las Vegas, NV 89101
(702) 385-5444
Nevada Lic # 1656