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UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

Grant, et al.,

Plaintiffs

vs.

Ivchenko, et al.,

Defendants.

No. 2:21-cv-00108-JJT

**DEFENDANTS' MOTION
TO SEAL CASE**

(Assigned to Hon. John J. Tuchi)

Defendants hereby move this court for entry of an Order, pursuant to LRCiv 5.6(a) and this Court's inherent authority, sealing this case. In support thereof, Defendants state as follows:

I. RELEVANT FACTUAL AND PROCEDURAL BACKGROUND

Plaintiffs (the "Plaintiffs" or the "Grants") were notorious mugshot website operators who filed suit against Andrew Ivchenko and Renee Ivchenko on January 21, 2021 (Doc 1), amended their complaint on March 17, 2021 (Doc 14), and then voluntarily dismissed this case on December 13, 2021 (Doc 29). Based on the actions of the Grants during the course of this litigation that involved several cases, and subsequent disciplinary actions by the Arizona State Bar against the Grants' attorney, David S. Gingras ("Mr. Gingras"), sealing of this entire case record is appropriate under the circumstances.

1 The litigation between the parties started with the unlawful publication of Renee
2 Ivchenko's booking photos and arrest records on the Grant mugshot websites, and profiting
3 therefrom. Plaintiffs' claims in this case were based on two Superior Court actions filed against
4 them by Defendants and subsequently removed to the Arizona District Court and later
5 voluntarily dismissed by those Doe plaintiffs (the "Doe plaintiffs"). What Plaintiffs refer to as
6 the "Second Case" or "Case 2" was filed on December 17, 2019 (the "Second Case").¹ (Doc
7 14, ¶¶ 107, 145). The Second Case initially involved only Andrew Ivchenko and Renee
8 Ivchenko as plaintiffs, represented by the Dickinson Wright law firm. (Doc 14, ¶ 107), and
9 included claims for defamation, false light, invasion of privacy, unlawful appropriation/right
10 of publicity, civil conspiracy, and intentional infliction of emotional distress.

13 Andrew Ivchenko was dropped as a party in an amended complaint filed on February
14 27, 2020, which also added 20 additional Doe plaintiffs asserting claims under A.R.S. § 44-
15 7901/7902 (the "Arizona Mugshot Act"). (Doc 14, ¶¶ 135-36). The amended complaint
16 dropped the claims relating to defamation, false light, and civil conspiracy, but maintained the
17 claims for invasion of privacy, unlawful appropriation/right of publicity, and intentional
18 infliction of emotional distress on behalf of all Doe plaintiffs. (Doc 1-4, Exhibit G, pages 22-
19 27). Plaintiffs removed the Second Case on April 3, 2020 (Case No. 20-cv-00674-MTL).

22 The Second Case was dismissed without prejudice on June 26, 2020, excepting Renee
23 Ivchenko, as she had dismissed an individual action against Plaintiffs earlier in 2019 after they
24 removed her arrest information from their websites. (Doc 14, ¶ 143).

26 ¹ Plaintiffs refer to a "First Case", filed by Renee Ivchenko on May 9, 2019, and voluntarily
27 dismissed on May 31, 2019 after the Grants removed her information from their websites. (Doc
28 14, ¶¶ 91-106). This "First Case" had no bearing on the causes of action alleged in Plaintiffs'
amended complaint.

1 In what Plaintiffs refer to as “Case 3,” Andrew Ivchenko, a licensed Arizona attorney,
2 filed a state court action on behalf of 20 other Doe plaintiffs on May 1, 2020, alleging
3 violations of the Arizona Mugshot Act (emphasis added) (the “Third Case”). (Doc 1-4, Exhibit
4 H). After consultation with the Dickinson Wright law firm, the parties concluded that it made
5 no economic sense to maintain two identical actions in two separate courts, so the Dickinson
6 Wright law firm filed a motion to dismiss the Second Case on May 19, 2020.

7
8 On June 9, 2020, Plaintiffs (Florida residents) removed the Third Case even though it
9 included Doe plaintiffs who resided in Florida (Case No. 20-cv-01142-SMB). The Doe
10 plaintiffs filed a motion to remand on July 9, 2020. On November 12, 2020, the Court issued
11 an order granting Plaintiffs’ request for jurisdictional discovery, but did not rule on the motion
12 to remand. (Doc 14, ¶ 166). By then the Doe plaintiffs in the case had lost patience, and decided
13 to pursue individual actions in state court with another law firm, as well as with Andrew
14 Ivchenko. As a result, the Doe plaintiffs filed a motion of voluntary dismissal of the Third
15 Case pursuant to F.R.C.P. 41(a)(1)(A)(i), which was granted on December 8, 2020. (Doc 14,
16 ¶ 171).

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19 What Plaintiffs saw as malicious intent in these cases was simply a matter of economics
20 when the Second Case was dismissed. In the Third Case, one party clearly preferred a federal
21 forum while the other party desired a state forum.

22
23 Defendants filed suit against the Grants and Mr. Gingras in state court on August 3,
24 2021 for their egregious abuse of process in those first two cases and targeted cyber harassment
25 of Defendants. (See Exhibit 1, Maricopa County Superior Court case no. CV2021-093562). A
26 copy of this complaint, with exhibits, it being provided in order to show the *extreme* lengths
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1 Defendants went in defending the two underlying cases against them, and that the filing of this
2 complaint was an abuse of process warranting sealing of the case. (See Exhibit 1, ¶¶ 48-123).

3
4 Subsequently, all cases involving Defendants and the Grants settled under the terms of
5 a settlement agreement dated December 10, 2021, which resulted in the closing of the Grants'
6 massive online mugshot operation. This settlement included pending litigation against the
7 Grants in Florida initiated by another party. (See *Doe v. Grant*; Seminole County (Florida)
8 Case No. 2021-CV-960 (filed 4/9/2021)).

9 10 **II. THE GRANT MUGSHOT OPERATION**

11 The Grants were First Amendment opportunists that exploited arrest information and
12 misappropriated images in booking photos to create misleading advertisements designed to
13 generate substantial advertising revenue from the victims whose images had been
14 misappropriated. (See Exhibit 1, ¶¶ 8-10). The Grants were notorious mugshot website
15 operators, and operated several websites that posted mugshots and criminal records, including
16 that of Renee Ivchenko. These include www.publicpolicerecord.com and
17 www.usbondsmen.com (the "Websites"), on which millions of arrestees appeared. (See Exhibit
18
19 1, ¶ 12).

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21 The Grants then used the arrest information from the victims whose identities and
22 likenesses were misappropriated to create original content in the form of advertisements that
23 served two purposes: 1) to attract third party advertisers to the website; and 2) generate pay-
24 per-click advertising revenue. (*Id.*). To further their illegal scheme and maximize its
25 commercial effect, the Grants used analytics and search optimization tools to ensure that each
26 booking photo was among the first search results found when an arrestee's name was entered
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1 into a search engine such as Google, Bing or Yahoo. (*Id.*, ¶ 16). Such conduct contributed
2 substantially to the illegality of the Grants' use of the arrest information and booking photos.
3 (*Id.*).
4

5 Also contrary to the Grant's false representations, the Grants refuse to remove
6 someone's mugshot from the Websites even if the arrestee has been found innocent of any
7 crime, or otherwise had their charges dropped, not filed, expunged, or dismissed as part of a
8 diversion program. (*Id.*, ¶ 19). Prospective employers (or anyone else) conducting a web search
9 found, in many cases, misinformation indicating that people were still charged, incarcerated, or
10 on parole years even after release or an adjudication of not guilty. (*Id.*). The Grant Defendants
11 intentionally and maliciously set up the Websites to give the false impression people were
12 incarcerated or had been adjudged guilty of a crime. (*Id.*). The end result for many arrestees
13 was continuous emotional distress, job loss, broken families, and homelessness. (*Id.*). The end
14 result for the Grant Defendants was substantial profits over many years. (*Id.*).
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17 In enacting A.R.S. §§ 44-7901, 7902 (the "Arizona Mugshot Act") in 2019, the Arizona
18 Legislature (the "Legislature") recognized that the commercial exploitation of one's arrest
19 information and booking photo causes daily, ongoing and continuing damage. The
20 Legislature's objective in passing the Arizona Mugshot Act was to put an end to the
21 reprehensible activities of mugshot website operators like the Grants. The Arizona Mugshot
22 Act encompasses the Grant's exact conduct. (See Exhibit 1 ¶¶ 94-105).
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25 Instead of ceasing their operations in the State of Arizona once the Legislature deemed
26 them unwelcome, the Grants and their pugnacious lawyer, Mr. Gingras, decided to go down
27 swinging. This resulted in the filing of several cases involving the parties herein as well as other
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1 parties and law firms, some of which were either dismissed by the plaintiffs or remanded, with
2 one side favoring a State court forum, and the Defendants favoring a federal court forum. In the
3 end, Defendants failed in their efforts to have these issues decided by a federal court, and there
4 was ongoing state court litigation at the time this action was commenced by Plaintiffs.² In
5 response, the Grants filed this groundless personal lawsuit against Defendants in an effort to
6 torpedo the state court litigation.

8 **III. MOTIONS TO SEAL**

9 Although there is a "strong presumption" in favor of access to judicial records, this
10 presumption may be overcome by providing compelling reasons supporting the request.
11 *Kamakana v. City and County of Honolulu*, 447 F.3d 1172, 1178-80 (9th Cir. 2006). Generally,
12 if a party seeks to seal a judicial record, the party bears the burden of overcoming this
13 presumption by articulating "compelling reasons supported by specific factual findings" to
14 justify sealing the records at issue. *Kamakana*, 447 F.3d at 1178. The court has discretion to
15 weigh the need for secrecy against the public's right of access. *San Jose Mercury News v. U.S.*
16 *Dist. Court*, 187 F.3d 1096, 1102 (9th Cir. 1999).

17 The Supreme Court has acknowledged that the decision to seal documents is "one best
18 left to the sound discretion of the trial court, a discretion to be exercised in light of the relevant
19 facts and circumstances of the particular case." *Nixon v. Warner Communications, Inc.*, 435
20 U.S. 589, 599, 98 S.Ct. 1306, 1312 (1978). Courts should consider "the interests [of] the parties
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25 ² Plaintiff Andrew Ivchenko had two active lawsuits against the Grants in Maricopa County
26 Superior Court filed on behalf of his clients, including Case No. CV2021-090059, filed January
27 6, 2021, and Case No. CV2021-090710, a class action on behalf of all Arizona victims of the
28 Grants, filed on February 12, 2021.

in light of the public interest and the duty of the courts.” *Hagestad v. Tragesser*, 49 F.3d 1430, 1434 (9th Cir. 1995) (*quoting Nixon*, 435 U.S. at 602).

“Under the ‘compelling reasons’ standard, a district court must weigh ‘relevant factors,’ base its decision ‘on a compelling reason,’ and ‘articulate the factual basis for its ruling, without relying on hypothesis or conjecture.’” *Pintos v. Pacific Creditors Ass’n*, 605 F.3d 665, 679 (9th Cir. 2010) (*quoting Hagestad*, 49 F.3d at 1434). In general, when “‘court files might have become a vehicle for improper purposes’ such as the use of records to gratify private spite, promote public scandal, circulate libelous statements, or release trade secrets,” there are “‘compelling reasons” sufficient to outweigh the public’s interest in disclosure. *Kamekana*, 447 F.3d at 1179.

IV. DEFENDANTS’ MOTION TO SEAL

Plaintiffs’ amended complaint (Doc 14) launched a veritable fusillade of rambling and hominid attacks against Defendants, including Defendant Andrew Ivchenko, a retired military officer and licensed Arizona attorney with an unblemished 33-year record in the law. This included unfounded allegations of criminal misconduct against both Defendants. (Doc 14, ¶¶ 62, 68). Publicizing these unsubstantiated allegations, which regularly appear on the internet through government websites, cause both parties damage to their personal and professional reputations.³ Absent a sealing order, Plaintiffs’ spiteful, libelous, scandalous (and unsubstantiated) allegations will continue to cause Defendants reputational harm. *Kamekana*, 447 F.3d at 1179.

³ See, e.g., https://www.govinfo.gov/content/pkg/USCOURTS-azd-2_21-cv-00108/pdf/USCOURTS-azd-2_21-cv-00108-0.pdf, and https://www.govinfo.gov/app/details/USCOURTS-azd-2_21-cv-00108/USCOURTS-azd-2_21-cv-00108-0/summary.

1 Although Defendant Renee Ivchenko entered a *preliminary* guilty plea in her previous
2 criminal case, the case was subsequently dismissed with prejudice by the prosecution on
3 September 27, 2018. (See Exhibit 2). Moreover, Plaintiffs’ allegations and conclusory
4 statements against Defendant Andrew Ivchenko are completely unfounded – Plaintiffs never
5 produced *any* evidence that Andrew Ivchenko submitted a copyright application on anyone’s
6 behalf, and there has been no criminal prosecution concerning the matter.
7

8 Plaintiffs’ goal in the cases that precipitated this action was always to deflect attention
9 from themselves by “killing the messenger.” These tactics were typical of them and Mr. Gingras
10 throughout the litigation – instead of focusing on the legal issues in good faith, Defendants used
11 “scorched earth” tactics to wear down their opponents. This included filing this groundless
12 complaint and conducting a vicious cyber harassment campaign against Defendants, designed
13 to cause maximum reputational harm and derail pending state court litigation. (See Exhibit 1,
14 ¶¶ 94-105).
15

16 Plaintiffs were notorious mugshot website operators who scraped booking photos and
17 arrest records from law enforcement agencies throughout the country. At their height, they had
18 collected the booking photos and arrest records of people numbering in the “tens of millions”
19 (Doc 14, ¶ 16) in what was arguably the largest mugshot website operation in the country,
20 which caused enormous damage to people’s reputations on an epic scale. (See Exhibit 1, ¶¶ 8-
21 19).
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23 Plaintiffs and Mr. Gingras did everything in their power to create a chilling effect
24 designed to dissuade other affected parties throughout the country from asserting their rights.
25 (See Exhibit 1, ¶¶ 106-11, 113, 138). Indeed, this tactic has been part of Mr. Gingras’ *modus*
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1 *operendi* throughout his career that has seen Mr. Gingras file questionable lawsuits against
2 attorneys and parties that have brought suit against his clients, mostly predatory internet
3 operators like the Plaintiffs. The best known of these cases involved Xcentric Ventures LLC
4 (which operates the notorious Rip-off Report). *See Xcentric Ventures, LLC v. Borodkin*, 798
5 F.3d 1201 (9th Cir. 2015). After relentlessly attacking opposing counsel, this groundless
6 lawsuit was dismissed by the court, and yet still appealed by the plaintiffs, to no avail. (See
7 Exhibit 1, ¶ 114-16).

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10 Before the cases involving the parties ended in a settlement, Defendant Andrew
11 Ivchenko filed a bar complaint against Mr. Gingras with the Arizona bar due to Mr. Gingras'
12 egregious violations of ethical rules. On March 23, 2022, by a unanimous vote, the Attorney
13 Discipline Probable Cause Committee of the Supreme Court of Arizona found that probable
14 cause existed that Respondent violated the following Rules of the Supreme Court of Arizona:
15 Rule 42, ER 4.2, 4.4, and 8.4(a). (See Exhibit 3). Respondent was admonished for violating
16 ERs 4.2, 4.4, and 8.4(a) for communicating about the subject of the representation with a party
17 without the consent of their counsel to do so. (See Exhibit 4, Defendant Andrew Ivchenko's
18 submission to the state bar outlining Mr. Gingras' conduct in these proceedings). The state bar
19 filed a formal complaint against Mr. Gingras on June 2, 2022. (See Exhibit 5).

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22 To be clear, Defendants are not basing this motion on any final decision by the Arizona
23 Supreme Court regarding Mr. Gingras' actions, which are predicted on his conduct during the
24 course of the litigation between the parties. Rather, that information is simply a part of the
25 overwhelming evidence here of **extreme** abuse of process designed for the ulterior purpose of
26 attempting to gain leverage through intimidation and causing maximum reputational harm. (See
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1 e.g., the following exhibits to Exhibit 4 - Exhibit 2, Affidavit of Andrew Ivchenko, and Exhibit
2 3, affidavit of Attorney Steven Scharboneau). The Grants wanted to prevent attorney Andrew
3 Ivchenko from pursuing pending state court cases against them, and attacked him and Renee
4 Ivchenko by filing this case in order to do so.

6 The third party evaluation of Mr. Gingras' conduct by the Arizona bar (including the
7 aforementioned affidavit from another attorney, Steven Scharboneau, who was involved in a
8 separate case against Plaintiffs), when coupled with the totality of the circumstances as
9 explained herein, shows that Plaintiffs and Mr. Gingras used this action as "a vehicle for
10 improper purposes" and "to gratify private spite, promote public scandal, [and] circulate
11 libelous statements[.]" *Kamekana*, 447 F.3d at 1179. As such, there are more than enough
12 "compelling reasons" in this case sufficient to outweigh the public's interest in disclosure. *Id.*

13 **V. ABUSE OF PROCESS**

15
16 Ironically, Plaintiffs alleged abuse of process in their complaint, when in fact it is *they*
17 who committed abuse of process by filing the complaint in the first place. That said, some
18 discussion of Plaintiffs' allegations is in order. An abuse of process claim requires proof that a
19 defendant committed a willful act in using judicial process for an ulterior purpose not proper in
20 the regular conduct of the proceeding. *Nienstedt v. Wetzel*, 133 Ariz. 348, 353 (App. 1982).
21 Evidence of the defendant's mere persistence in litigation, even if based on an improper motive,
22 does not sustain the tort. *Crackel v. Allstate Ins. Co.*, 208 Ariz. 252, 92 P.3d 882, 888 (Ariz.
23 App. 2004). Even a pure spite motive is not sufficient where process is used only to accomplish
24 the result for which it was created. *Fappani v. Bratton*, 407 P.3d 78, 84 (Ariz. App. 2017).
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1 Arizona courts impose two additional requirements that deter frivolous, unfounded, or
2 ill-defined abuse of process claims. *Crackel*, 92 P.3d at 889. First, a plaintiff must present more
3 than mere speculation to support the assertion that the defendant has used court processes with
4 an improper intent. *Id.* Instead, a plaintiff must show that the defendant's improper purpose was
5 the primary motivation for its actions, not merely an incidental motivation. *Id.* Thus, a claim of
6 abuse of process may not be based solely on the fact that an opposing litigant received some
7 secondary gain or emotional satisfaction from the use of a court process. *Id.* Rather, a claimant
8 must present evidence that the court process was used primarily to pursue that improper motive.
9 *Id.*

12 Second, to demonstrate that a defendant's primary motive was improper, a claimant must
13 establish that the defendant used a court process in a fashion inconsistent with legitimate
14 litigation goals. *Id.* Thus, a plaintiff must not only present evidence that the defendant used a
15 court process for a primarily improper purpose, they must also show that, in using the court
16 process, the defendant took an action that could not logically be explained without reference to
17 the defendant's improper motives. *Id.*

20 Plaintiffs' arguments supporting their abuse of process claims (Counts Two and Four)
21 are little more than legal conclusions that the two cases in issue here were "groundless" and
22 used "in a wrongful manner that was not proper in the normal course of the proceedings." [See
23 Doc 14, ¶¶ 219-220, 240, 244]. The issue of "groundless" litigation was not resolved in this
24 case, which was in its early stages and has nothing to do with abuse of process. Legal
25 conclusions couched as factual allegations are not given a presumption of truthfulness, and
26

1 "conclusory allegations of law and unwarranted inferences are not sufficient to defeat a motion
2 to dismiss." *Pareto v. FDIC*, 139 F.3d 696, 699 (9th Cir. 1998).

3
4 Moreover, the primary purpose of the litigation in both cases preceding this lawsuit was
5 the desire of the Doe plaintiffs to obtain relief under Arizona law. [See Docs 1-3, Exhibit G; 1-
6 4, Exhibit H]; *Crackel*, 92 P.3d at 889. Since Plaintiffs did not allege specific, nonconclusory
7 factual allegations that establish that judicial process was used for an ulterior purpose not proper
8 in the regular conduct of the proceeding, Plaintiffs Second and Fourth causes of action failed
9 as a matter of law.
10

11 **VI. JUDICIAL NOTICE**

12 Defendants respectfully request, pursuant to Fed. R. Evid. 201(b)(2), that the Court take
13 judicial notice of the public records described herein, at Exhibits 1-5. Judicial notice of these
14 documents is proper because a court may take judicial notice of any fact that "is generally
15 known within the trial court's territorial jurisdiction; or ... can be accurately and readily
16 determined from sources whose accuracy cannot reasonably be questioned." *State v. Rhome*,
17 235 Ariz. 459, 461, 333 P.3d 786, 788 (App. 2014). Courts may take judicial notice of court
18 filings and other matters of public record. *See Reyn's Pasta Bella, LLC v. Visa USA, Inc.*, 442
19 F.3d 741, 746 n. 6 (9th Cir. 2006); *Lee v. City of Los Angeles*, 250 F.3d 668, 689 (9th Cir.
20 2001).

21
22 Here, the requested documents are "not subject to reasonable dispute" in that they are
23 "capable of accurate and ready determination by" referring to public records sources "whose
24 accuracy cannot reasonably be questioned." Fed. R. Evid. 201(b)(2). Accordingly, Defendants
25 respectfully request that the Court take judicial notice of the following Exhibits to this motion:
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Exhibit 1: Complaint filed on August 3, 2021, in *Andrew Ivchenko and Renee Ivchenko v. David S. Gingras, et. al.*, Superior Court of Maricopa County case no. CV2021–093562.

Exhibit 2: Criminal Court Case Information - Case History of Renee Ivchenko, available through the Judicial Branch of Maricopa County website at www.superiorcourt.maricopa.gov.

Exhibit 3: Attorney Discipline Probable Cause Committee of the Supreme Court of Arizona, Order of Admonition, And Costs, dated March 23, 2022, relating to Attorney David S. Gingras.

Exhibit 4: Andrew Ivchenko’s Letter to Staff Bar Counsel, State Bar of Arizona, dated May 27, 2022, including Affidavit of Andrew Ivchenko (Exhibit 2 thereto), filed in the Circuit Court of the Eighteenth Judicial Circuit, Seminole County, Florida, Case No. 2021-CA-000960, and Declaration of attorney Steven Scharboneau in support of Plaintiff’s Motion to Proceed Under Pseudonym, dated December 1, 2020, filed in the Superior Court of Maricopa County, Case No. CV2020-055722, *Doe v. Grant, et. al.* (Exhibit 3 thereto).

Exhibit 5: Formal complaint filed by the Arizona State Bar against attorney David S. Gingras, Case No. PDJ 2022-9037, dated June 2, 2022.

VII. CONCLUSION

Defendants should not have to suffer permanent reputational harm as a result of the outrageous and unethical actions of Plaintiffs and Mr. Gingras, as documented herein. This action is a **textbook** example of a party using a lawsuit as a “vehicle for improper purposes.” *Pintos*, 605 F.3d at 679. Defendants have articulated myriad “relevant factors” and “compelling

1 reasons” herein that warrant sealing this entire case record. *Id.* Needless to say, lawyers in
2 particular are concerned about their reputations, and it is patently unfair that an attorney who
3 conducted himself in Mr. Gingras’ manner be allowed to use this case to permanently tarnish
4 the reputations of Andrew Ivchenko and Renee Ivchenko with impunity.
5

6 Indeed, Mr. Gingras dragged Defendants into the gutter for his own selfish reasons. The
7 public interest in this case is virtually nonexistent – this case never even proceeded to discovery,
8 so there is no reason for these unfounded allegations, including serious allegations of criminal
9 misconduct, to be public. On the other hand, the impact against Defendants is substantial, and
10 Defendants have presented “compelling reasons” that overcome the “strong presumption” in
11 favor of access to judicial records. *Kamekana*, 447 F.3d at 1179. Plaintiffs used this case “to
12 gratify private spite, promote public scandal, [and] circulate libelous statements [...]” *Id.*, 447
13 F.3d at 1178-80. This Court has the discretion to weigh the need for secrecy against the public’s
14 right of access, and the balance here weighs strongly in Defendants’ favor. *San Jose Mercury*
15 *News*, 187 F.3d at 1102.
16

17 For all of the reasons set forth above, Defendants respectfully request that their Motion
18 to Seal this case be granted.
19

20
21 RESPECTFULLY SUBMITTED this 20th day of September, 2022.

22 ANDREW IVCHENKO PLLC

23
24 By: /s/ Andrew Ivchenko
25 Andrew Ivchenko
26 Attorney for Defendants
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CERTIFICATE OF SERVICE

I hereby certify that on September 20, 2022, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrant:

David S. Gingras, #021097
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Attorney for Plaintiffs

/s/ Andrew Ivchenko