



Jorden Timothy <jordan.timothy@grsm.com>

Official Service Of Demand For Arbitration - JAMS

Jorden Timothy <jordan.timothy@grsm.com>

Tue, Feb 18 at 7:34 PM

To: smooore@grsm.com <smooore@grsm.com>

Cc: Jamie Olvera <yolvera@grsm.com>

Dear Sara A. Moore,

Pursuant to JAMS rules and the arbitration agreement, attached is a formal Demand for Arbitration filed against the following Respondents:

1. DRVM LLC (Dissolved)
2. AMJ Services LLC
3. Maged Boutros (Individually, under ORS 60.645)

JAMS has received and processed the arbitration filing, including all supporting exhibits. If you require direct access to these documents, please confirm, and I will provide them separately.

As you are now representing the Respondents, this email serves as official notice and service of the arbitration filing.

Please confirm receipt of this email. Additionally, please confirm whether you represent all three Respondents listed above. If there is a separate legal representative for any Respondent, kindly provide their contact information for further communications.

Best regards,

Jorden Hollingsworth

[Redacted signature]

Demand of Arbitration.pdf, JAMS Arbitration Demand.pdf

Confirmation of Representation – Amendment to Demand

3 messages

Jorden Timothy <[REDACTED]>
To: <smoore@grsm.com>
Cc: Jamie Olvera <yolvera@grsm.com>

Thu, Feb 27 at 4:07 PM

Sara Moore,

I am submitting an amendment to my arbitration demand, which includes naming additional respondents. Given your representation of the original respondents, I need confirmation on whether you will also be representing the newly named parties.

Since my previous emails have gone unanswered, I am setting a firm deadline of Monday for your response. If I do not receive confirmation by **10:00AM on March 3rd, 2025**, I will proceed with serving each newly named respondent individually.

I expect a response to this email confirming either (1) that you will be representing the additional respondents, or (2) that they will need to be served separately. Please advise accordingly.

Thank you for your prompt attention to this matter.

Best,

Jorden Hollingsworth

* Exhibit List.pdf, *New Amendment .pdf

Sara Moore <smoore@grsm.com>
To: Jorden Timothy <[REDACTED]>
Cc: Nicole Demmon <ndemmon@grsm.com>, Jamie Olvera <yolvera@grsm.com>

Mon, Mar 3 at 1:18 PM

Dear Mr. Timothy:

We have received your Amended Demand for Arbitration, dated February 27, 2025. As stated previously in my February 14 communication, we can confirm that we represent Respondent DRVM, LLC. We also understand based on your amended demand that you have named 10 additional respondents, but we will need to confirm whether they are properly named as we suspect many are not appropriate parties to this claim and whether we will represent them.

Given that the demand raises causes of action under Oregon law, my colleague, Nicole Demmon, will be handling this claim on behalf of DRVM moving forward. She will contact you soon to schedule a time to meet and confer about the named respondents and service.

Thanks,
Sara

SARA A. MOORE

Partner & Bay Area Co-Practice Group Leader

**GORDON REES SCULLY MANSUKHANI | GRSM50
YOUR 50 STATE LAW FIRM™**

315 Pacific Avenue, San Francisco, CA 94111

P: 415.986.5900 | F: 415.986.8054

smoore@grsm.com

grsm.com

vCard | Bio | LinkedIn

[Quoted text hidden]

of the intended recipients of this e-mail. If you are not the intended recipient of this e-mail, please do not disseminate, distribute, disseminate, or copy of the information in which is contained. If you are not the intended recipient and have received this communication in error, please immediately notify us by reply e-mail, delete the communication and destroy all copies.

GORDON REES SCULLY MANSUKHANI, LLP
YOUR 50 STATE LAW FIRM™
<http://www.grsm.com>

Jorden Timothy [REDACTED]
To: Sara Moore <smoore@grsm.com>

Mon, Mar 3 at 1:27 PM

Dear Ms. Moore,

Thank you for your response confirming receipt of my amended demand for arbitration. I understand that your firm represents DRVM, LLC and that you are assessing whether you will also represent additional respondents.

To clarify, **all named respondents were included based on clear financial, payroll, and business structuring connections to the claims at issue.** Given the nature of this dispute, the **appropriate forum to determine each respondent's involvement is through full discovery, including payroll records, commission structures, and financial transfers between entities.**

I am open to a meet-and-confer discussion regarding procedural matters, including service, but I want to emphasize that **any argument regarding whether a respondent is an "appropriate party" is premature at this stage, as no discovery has taken place.** The facts surrounding payroll movement, commissions, and financial responsibility will determine liability, and I intend to request **full discovery into these matters before any determinations are made** regarding respondent involvement.

Please let me know your availability to schedule a discussion. I look forward to your colleague, Ms. Demmon,

reaching out.

Best regards,

Jorden Hollingsworth
[REDACTED]
[Quoted text hidden]