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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

JORDEN HOLLINGSWORTH, Petitioner, v. SANOFI-AVENTIS US; CHATTEM INC.; QUTEN RESEARCH INSTITUTE LLC; AMJ SERVICES LLC; DRVM LLC; DEEPAK CHOPRA; MAGED BOUTROS; ASHRAF BOUTROS; MARIE-LAURIE AMIARD-BOUTROS, Respondents.	Case No. 3:25-cv-01342-AB **RESPONDENT DRVM LLC'S REQUEST FOR COURT TO CORRECT THE DOCKET FOR ALL RESPONDENTS**

Respondent DRVM LLC respectfully requests the Court to update deadlines currently reflected on the docket and to clarify that no Answer or Rule 12 Motion is required of any Respondent in this matter. The Court has already issued such clarification with respect to

Respondent DRVM LLC, but the docket continues to reflect responsive pleading deadlines as to the remaining Respondents, creating potential confusion and prejudice.

I. Background

On July 31, 2025, Petitioner Hollingsworth filed with this Court a Petition pursuant to the Federal Arbitration Act (FAA), 9 U.S.C. § 5, seeking the appointment of an arbitrator. Petitioner did not file a Complaint initiating a civil action.

Nevertheless, the Petition appears to be incorrectly processed as if it were a Complaint, and a Summons was issued directing Respondents to "serve and answer or file a Rule 12 motion." Because there is no Complaint on file, no Respondent can properly file an "Answer," and the issuance of a Summons created procedural confusion.

On September 2, 2025, counsel for Respondent DRVM LLC raised this issue with the Court's clerk. On September 4, 2025, the Court entered a scheduling order clarifying that Respondent DRVM LLC need not respond further at this time. However, the docket was not corrected with respect to the other named Respondents.

II. Legal Standard

Under the FAA, " any application to the court under this title shall be made and heard in the manner provided by law for the making and hearing of motions." 9 U.S.C. § 6. Because Petitioner filed only a Petition—an application under the FAA—the matter proceeds by motion practice, not by complaint-and-answer pleading. Accordingly, there is no operative Complaint to which Respondents must file an Answer or Rule 12 Motion.

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III. Argument

A. There is no operative Complaint to which Respondents may respond.

The Summons directs Respondents to serve an answer to "the complaint," but no complaint has been filed. As such, the docket entry requiring an Answer or Rule 12 motion is in error.

B. The Court has already clarified that Respondent DRVM LCC need not respond.

On September 2, the Court issued an order confirming that Respondent DRVM LLC need not file a responsive pleading. The same reasoning applies equally to all named Respondents.

C. Uniform docket correction avoids confusion and prejudice.

Leaving incorrect deadlines in place as to other Respondents risks unnecessary filings or, worse, default proceedings where no complaint exists. Correcting the docket uniformly will avoid such prejudice, streamline the record, and preserve judicial economy.

IV. Relief Requested

For the foregoing reasons, Respondent DRVM LLC respectfully requests that the Court:

1. Confirm that Petitioner Hollingsworth has not filed a Complaint in this action;

2. Vacate all current responsive pleading deadlines reflected on the docket as tied to a non-existent Complaint; and

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3. Clarify that no Answer or Rule 12 Motion is required of any Respondent in this matter, absent further order of the Court.

DATED this 19th day of September 2025.

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s/ Stephen M. Scott

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