Jorden Hollingsworth
[redacted]

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

JORDEN HOLLINGSWORTH,

Case No. 3:25-cv-01342-AB

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.

PETITIONER'S MOTION FOR LEAVE TO FILE SUR-REPLY IN OPPOSITION TO RESPONDENT DR. DEEPAK CHOPRA'S MOTION TO DISMISS

COMES NOW Petitioner Jorden Hollingsworth, proceeding pro se, and urgently moves for leave to file a sur-reply to Respondent Dr. Deepak Chopra's Motion to Dismiss (*ECF No. 26, September 22, 2025*) and Reply (*ECF No. 32, October 1, 2025*). The Reply shifts from defending Chopra to dismissing the case as a "fishing expedition," "nonsensical word salad," "grand conspiracy," and "just a wage claim," adopting a nearly identical dismissive narrative to DRVM's "scattershot inclusion," and "just a wage claim" (*ECF No. 6*). By omitting the whistleblower notice (*ECF No. 7 and ECF No. 2, Ex.15)*, which documents Petitioner's role in triggering a referral to IRS audit of three pharmaceutical companies under the Taxpayer First Act (*TFA, 26 U.S.C. § 7623(d)*), and speculating that Exhibits in the Petitioner's opposition (*ECF*

31) that are before this court are "unauthenticated," the Reply introduces new issues, prejudicing Petitioner's rebuttal rights.

I. BACKGROUND

Petitioner's FAA § 5 petition (*ECF No. 2, July 31, 2025*) alleges a Sanofi-Aventis US-controlled fraudulent network triggering an IRS audit referral of Sanofi, Chattem, and Quten (*ECF No. 7 and ECF No. 2, Exhibit 15*). *ECF No. 7* identifies Petitioner as the whistleblower prompting the referral to audit. Five respondents (Quten, Maged/Ashraf Boutros, Marie-Laurie Amiard-Boutros, AMJ Services) are now past the default deadline, and Sanofi/Chattem evade U.S. Marshal service (*ECF No. 20, 21*). Petitioner's motion to deem service effective is pending. DRVM's pending motion to "fix" deadlines for all respondents (*ECF No. 24*) which directly contradicts Chopra's Reply, as both seek to limit responses and misrepresent the record. Petitioner's opposition to Chopra's MTD (*ECF No. 31*) cited Marshal service and IRS involvement. The Reply's pivot to "vanilla petition," and "just a wage claim" (*p. 4-5*), echoing DRVM's "scattershot" and "just a wage claim" (*ECF No. 6*), omits *ECF No. 7* to shield the network, requiring a sur-reply to unify the case.

II. LEGAL STANDARD

Sur-replies are warranted when a reply raises new issues causing prejudice. *Zamani v. Carnes, 491 F.3d 990, 997 (9th Cir. 2007).* For pro se litigants, fairness requires allowing responses to new reply arguments. *Provenz v. Miller, 102 F.3d 1478, 1483 (9th Cir. 1996); Haines v. Kerner, 404 U.S. 519, 520 (1972).* This is heightened under TFA protections (*26 U.S.C. § 7623(d)).*

III. GROUNDS FOR SUR-REPLY

The Reply introduces prejudicial new issues:

1. **Service Mischaracterization**: Claims Petitioner argues JAMS rules override FRCP 4 (*p. 7*), twisting reliance on U.S. Marshal service under *28 U.S.C. § 1915(d)* for six months of JAMS notice (*ECF No. 31, p. 6-8, and Ex. M of ECF No. 31*).

2. **Speculative Pharmaceutical Denial**: Calling *Exhibits A-L* "unauthenticated" and "just a wage claim" contradicts the referral to IRS audit of Sanofi, Chattem, and Quten, triggered by those same exhibits, which meet Twombly/Iqbal plausibility (*Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555-56 (2007); Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)).*

3. **Coordinated Defense to Limit Responses**: Chopra's MTD protects himself; the Reply protects the fraudulent network, attacks the petitioner, and dismisses the case, issues absent from the MTD. Its "vanilla petition," "nonsensical word salad," and "grand conspiracy" *(p. 4-5)* mirror DRVM's "scattershot inclusion," "legally baseless claims," and "conspiracy style" (*ECF No. 6*), both seeking to prevent responses and caricature the petition as baseless, despite the record's evidence.

4. **Omission Suggesting Retaliation**: The Reply omits *ECF No. 7*, which Chopra claims is irrelevant, cherry-picks the arbitration demand while barring its context, and attacks Petitioner, the whistleblower exposing the network, suggesting continued TFA retaliation (*26 U.S.C. § 7623(d)).*

IV. PROPOSED RELIEF

Petitioner requests leave to file the attached 4-page sur-reply, filed October 6, 2025, to unify the case without delay.

V. CONCLUSION

Dr. Chopra's Reply is not a good-faith rebuttal. It is a strategic, coordinated pivot that introduces a new, unified defense narrative with the explicit goal of shielding the entire respondent network from scrutiny. By adopting DRVM's dismissive language, omitting the material fact of the IRS audit referral, and attacking the petition as a "conspiracy," the Reply seeks to capitalize on the procedural chaos created by defaulting and evading co-respondents.

This concerted effort to mischaracterize the record and prejudice Petitioner's rights is the precise type of "new issue" that justifies a sur-reply. Granting leave is essential to correct the misrepresentations, uphold the integrity of the judicial process, and ensure that a pro se whistleblower is not silenced by a coordinated, multi-respondent legal strategy. The Court should grant this motion to ensure its ruling is based on a complete and accurate record.

Respectfully submitted,

Date: October 6, 2025

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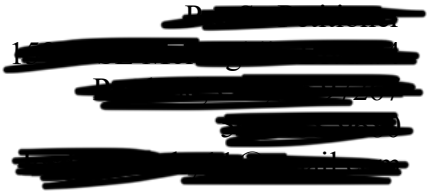
Jorden Hollingsworth



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PETITIONER'S SUR-REPLY IN OPPOSITION TO RESPONDENT DR. DEEPAK CHOPRA'S MOTION TO DISMISS

Petitioner Jorden Hollingsworth, pro se, submits this sur-reply to counter Respondent Dr. Deepak Chopra's Reply (*ECF No. 32, October 1, 2025*), which shifts from personal defense to dismissing the case as a "fishing expedition," "nonsensical word salad," "grand conspiracy," and "just a wage claim" (*p. 4-5*). Adopting a nearly identical narrative to DRVM's "scattershot inclusion," "legally baseless," "conspiracy style," and "just a wage claim" (*ECF No. 6*), it speculates by omitting the whistleblower notice (*ECF No. 7*), documenting Petitioner as the whistleblower triggering a referral to IRS audit of three pharmaceutical companies for tax violations under the Taxpayer First Act (*TFA, 26 U.S.C. § 7623(d)*), and twisting the same *Exhibits A-L* as "unauthenticated" and "can't prove it's me" despite their audit validation.

I. SERVICE WAS LAWFUL, NOT A JAMS RULE OVERRIDE

The Reply mischaracterizes Petitioner's claim, alleging JAMS rules override FRCP 4 (*p. 7*). The opposition (*ECF No. 31, p. 6-8*) showed U.S. Marshals served notice under *28 U.S.C. § 1915(d)* at Chopra's Foundation address for JAMS arbitration (*Case No. 5160000821*) over six months. Chopra received several notices from JAMS at his Foundation address, which JAMS deemed valid under their rules (*ECF 31, Ex. M*). The U.S. Marshals subsequently used this same address for service in this court. Pro se petitioners aren't liable for Marshal execution in good faith (*Vineyard v. Soto, 2008 WL 2244869 (E.D. Cal. May 29, 2008)*). Due process is satisfied (*Mullane v. Central Hanover Bank & Trust Co., 339 U.S. 306 (1950)*), and silence waives objection (*Peterson v. Highland Music, 140 F.3d 1313 (9th Cir. 1998)*).

II. REPLY'S SPECULATIVE DISMISSAL CONTRADICTS AUDIT EVIDENCE

Unlike the MTD, which defends Chopra, the Reply protects the network by speculating that *Exhibits A-L*, before this Court, are "unauthenticated" and the case is a "vanilla petition" or "just a wage claim with his employer," contradicting their role in triggering an IRS audit referral of Sanofi, Chattem, and Quten for tax violations (*ECF No. 2-Ex. 15 and ECF No. 7*). The Reply cherry-picks statements from the arbitration demand (*JAMS Case No. 5160000821, ECF No. 2-Ex. 2*) to support this dismissal while instructing the Court and Petitioner not to consider its context, yet blames Petitioner for adding context when responding to these distortions, prejudicing Petitioner's ability to rebut. These exhibits, and those to be shown, meet Twombly/Iqbal plausibility (*Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555-56 (2007); Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)*), as the IRS's involvement validates their factual basis. The Reply's omission of *ECF No. 7*, which Chopra claims is irrelevant, yet attacks

Petitioner, the whistleblower exposing the network, suggests continued TFA retaliation (*26 U.S.C. § 7623(d)).*

III. COORDINATED DEFENSE TO LIMIT RESPONSES

The Reply's "just a wage claim," "nonsensical word salad," and "grand conspiracy" (p. 4-5) echo DRVM's "scattershot inclusion," "conspiracy style," and "just a wage claim" (*ECF No. 6*), both seeking to prevent responses and caricature the petition as baseless, despite the record's evidence of defaults, evasion, and an audit. This coordinated effort, absent from the MTD, misrepresents the case to shield the network, prejudicing Petitioner's right to clarify its complexity *(Laub v. U.S. Dep't of Interior, 342 F.3d 1080 (9th Cir. 2003)).*

IV. DISCOVERY IS NECESSARY, NOT A FISHING EXPEDITION

The Reply's omissions, cherry-picking, and rhetoric, align precisely with DRVM's motion and strategy, shield the network while five respondents' default and Sanofi/Chattem evade. *Exhibits A-L*, validated by the audit referral, and further evidence to be shown, suffice for discovery, not a "fishing expedition." *United States v. Ritchie, 342 F.3d 903, 908 (9th Cir. 2003).* Chopra's attack on the whistleblower, while omitting *ECF No. 7*, suggests ongoing TFA violations.

V. CONCLUSION

Chopra's Reply, in lockstep with DRVM's tactics, distorts the record by omitting the whistleblower notice (*ECF No. 7*), cherry-picking the arbitration demand, and misrepresenting the petition's FAA basis, the Sanofi-controlled network, jurisdiction, and docket complexity to

dismiss a case grounded in an IRS audit referral exposing tax violations. These new arguments, absent from the MTD, prejudice Petitioner's rights as a TFA-protected whistleblower and shield a scheme evading accountability through defaults and service obstruction. The Court should deny the MTD or order discovery to unravel this network, ensuring justice and public interest prevail.

Respectfully submitted,

Dated: October 6, 2025

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Jorden Hollingsworth
Pro Se Petitioner
[redacted]