

**PETITIONER'S SUPPLEMENTAL NOTICE OF RECORD CLARIFICATION REGARDING FALSE CLAIMS
MADE BY RESPONDENT DRVM**

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**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.

**SUPPLEMENTAL NOTICE OF RECORD CLARIFICATION REGARDING FALSE
CLAIMS MADE BY RESPONDENT DRVM**

Petitioner submits this supplemental notice to correct material inaccurate statements by Respondent DRVM LLC in its response (ECF No. 6) to the pending Petition to Compel Arbitrator Appointment. This is not a formal reply, but a narrowly tailored filing submitted to preserve the accuracy of the record and prevent judicial reliance on incorrect procedural representations prior to resolution of the in forma pauperis (IFP) application and service determinations.

1. JAMS Dashboard Misrepresentation

Respondents claim that multiple entities were “removed” from the arbitration by JAMS (ECF No. 6, page 4). This is factually false. JAMS never issued any decision or order removing any party. The dashboard update occurred only after Gordon Rees Scully Mansukhani LLP (GRSM) unilaterally withdrew its representation of AMJ Services LLC and Maged Boutros, as clarified in Petitioner’s formal communication to JAMS (Exhibit 5). In good faith, Petitioner reserved both AMJ and Maged Boutros through their registered agent in Oregon. There was no JAMS ruling, no dismissal, and no decision by the tribunal, only an internal administrative update following a sudden law firm withdrawal.

2. False Claim of Unrelated Parties

DRVM asserts that several named Respondents are unrelated (ECF No. 6, page 1). This is demonstrably false. JAMS’s own arbitrator disclosure documents (Exhibit 31, page 7) list AMJ Services and DRVM together, signaling corporate affiliation. Petitioner’s claim is not speculative, it reflects what JAMS themselves disclosed.

In addition, the IRS has assigned formal whistleblower claim numbers to Sanofi-Aventis U.S., Chattem Inc., and Quten Research Institute, based on the very same employment structure underlying this arbitration (Exhibit 15). DRVM was not assigned a claim number, reinforcing the fact that it was treated as a subordinate or proxy entity by those under federal investigation. The assertion that these entities are “unrelated” is not just misleading, it contradicts government findings and the record already before this Court.

3. Omission of Maged Boutros's Role and DRVM's Mid-Arbitration Reactivation

Respondents also omit that Maged Boutros is the CEO of DRVM LLC, as confirmed by Oregon Secretary of State records (Exhibit 14, page 1). More importantly, DRVM was a dissolved entity at the time Petitioner submitted the original arbitration demand, as well as the duration of employment. It was quietly reinstated during the ongoing arbitration without notice, justification, or disclosure to JAMS or Petitioner. This corporate maneuver is documented in Exhibit 14.

The failure to disclose this timeline, while simultaneously arguing that other parties are irrelevant, creates a materially false impression of the structural reality behind this dispute. The reactivation and concealment of DRVM's corporate status directly supports Petitioner's claim that Respondents have manipulated entity status and forum procedure to frustrate resolution.

These misrepresentations, if left uncorrected, risk skewing the Court's understanding of party status, service requirements, and the scope of relief requested — particularly at this early stage, before IFP determination and formal service confirmation. Petitioner respectfully requests that the Court not treat DRVM's representations as dispositive and instead reserve judgment until all filings, factual exhibits, and procedural history are reviewed in full.

Petitioner reserves all rights to file a formal reply per court rules and submits this notice solely to prevent early prejudice and to preserve the integrity of the record.

Respectfully submitted,

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