

**RETURN OF SERVICE**

Service of the Summons and complaint was made by me <sup>(1)</sup>	DATE <b>January 3, 2020</b>
NAME OF SERVER ( <i>PRINT</i> ) <b>Maurice B. VerStandig</b>	TITLE <b>Attorney for the Plaintiffs</b>

Check one box below to indicate appropriate method of service

- Served personally upon the defendant. Place where served: \_\_\_\_\_  
\_\_\_\_\_
- Left copies thereof at the defendant's dwelling house or usual place of bode with a person of suitable age and discretion then residing therein.
- Name of person with whom the summons and complaint were left: \_\_\_\_\_
- Returned unexecuted: \_\_\_\_\_  
\_\_\_\_\_
- Other (specify) : (See attached supplemental statement) \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**STATEMENT OF SERVICE FEES**

TRAVEL	SERVICES	TOTAL
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**DECLARATION OF SERVER**

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on January 3, 2020  
Date

/s/ Maurice B. VerStandig  
*Signature of Server*  
9812 Falls Road, #114-160  
Potomac, Maryland 20854  
Address of Server

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**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

VERONICA BRILL, *et al.*

Plaintiffs,

vs.

MICHAEL L. POSTLE, *et al.*

Case No.: 2:19-cv-02027

SUPPLEMENT TO AFFIDAVIT OF  
SERVICE

1. My name is Maurice Belmont VerStandig, I am over the age of eighteen (18), and I am competent to testify to the matters set forth herein.

2. I am counsel for the plaintiffs herein.

3. On Friday, January 3, 2020, at 9:21 pm local time, I approached the residence located at 3724 Deer Walk Way in Antelope, California (the “House”), where I understand Michael L. Postle (“Mr. Postle” or the “Defendant”) to reside.

4. While at the House, I interchangeably knocked on the door and rang the door bell, announcing my presence, for a period of approximately eight (8) minutes, during which time I observed lights to be on the House, I observed a Lincoln MKX with California license plate 7UQU335 to be parked in the House’s driveway, and I heard noises emanate from inside of the House.

5. After approximately eight (8) minutes, I retreated across the street to my personal vehicle, in which I remained with all lights turned off, and the engine turned off, so as to monitor activity in the House through its windows.

1           6.       I then saw a male, meeting the description of the Defendant (whose description I  
2 know from viewing myriad photographs, viewing dozens of video recordings, and one personal  
3 meeting prior to this litigation), inside the House, standing atop the stairwell.

4           7.       At this juncture, I returned to the door of the House, commenced to knock on the  
5 door and ring the doorbell interchangeably once again so as to announce my presence, and I  
6 witnessed movements through a window curtain and noises drawing nearer to the door upon  
7 which I was knocking.

8           8.       At this time, I placed the summons and complaint in the above-referenced action  
9 between the security door and the front door of the House, calling out for the Defendant.

10          9.       Upon returning to my car, I again witnessed movement inside the House, through  
11 windows affording a view of the upstairs portion of the House.

12          10.       Prior to my serving the Defendant in this fashion, a local process server  
13 endeavored to serve the Defendant, at the House, on December 19, 22, 24, 29, and 30, to no  
14 avail.

15          11.       Prior to my engaging a process server to attempt service at the House, I personally  
16 spoke with William Portanova (“Mr. Portanova”), a local attorney who has identified himself in  
17 the news media as representing the Defendant in connection with this matter, and asked him to  
18 accept service, to which he indicated he would confer with his client and get back to me, while  
19 also clarifying that he does *not* represent the Defendant in connection with a civil proceeding but,  
20 rather, is a criminal defense attorney.

21          12.       On at least three occasions since, messages I have left for Mr. Portanova at his  
22 office have gone unreturned.

1           13.     Based on Mr. Portanova’s failure to respond to me after speaking with the  
2 Defendant, the professional process server’s five (5) unsuccessful service attempts, the  
3 Defendant’s failure to respond to a litigation hold letter he was sent by me prior to this suit being  
4 filed, the severity of the allegations lodged against the Defendant herein, the nature of one or  
5 more ongoing criminal investigations into the Defendant’s behavior implicated herein, and the  
6 totality of the circumstances, I deduced the Defendant to be actively engaged in the avoidance of  
7 service.  
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9           14.     As an attorney licensed to practice law in fourteen (14) federal courts and before  
10 the highest courts of five (5) states, I am familiar with the rules governing the evasion of service,  
11 the protocols for service of process in a federal suit, and the standards set forth in Federal Rule of  
12 Civil Procedure 4.

13           15.     Based on a review of governing case law, including the United States Court of  
14 Appeals for the Ninth Circuit’s opinion in *Travelers Cas. & Sur. Co. of Am. v. Brenneke*, 551  
15 F.3d 1132, 1134 (9th Cir. 2009), where a nearly-identical fact pattern is implicated and service is  
16 found to have been successfully made from the other side of a window, I do swear to the veracity  
17 of the facts set forth herein, upon my personal knowledge, and respectfully suggest the same to  
18 constitute good and valid service of process upon the Defendant.  
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20           16.     Further affiant sayeth naught.  
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