

CAUSE NO. 2018-09526

FREE AND SOVEREIGN STATE OF
VERACRUZ DE IGNACIO DE LA LLAVE
Plaintiff,

vs.

SOFIA HERNANDEZ, ARTURO ZURITA, &
JAVIER DUARTE
Defendants.

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IN THE DISTRICT COURT OF

61ST JUDICIAL DISTRICT

HARRIS COUNTY, TEXAS

JURY TRIAL DEMANDED

PLAINTIFF'S MOTION FOR SUBSTITUTED SERVICE

Plaintiff, the Free and Sovereign State of Veracruz De Ignacio De La Llave (“Veracruz”) filed their Original Petition and Application for Temporary Restraining Order naming Monica Babayan as a Defendant. Sofia Hernandez was involved in a civil conspiracy to steal millions — if not billions — of dollars in government funds from the State of Veracruz. This stolen money was used to make investments and purchase luxury homes and cars all over the United States. In this suit, Plaintiff seeks to recover a portion of those stolen funds as well as assets purchased in the United States with stolen funds.

Plaintiff attempted to serve Sofia Hernandez but she could not be found. See Exhibit A, Affidavit of Due Diligence. Attempts by personal service were made at the only known address, and were unsuccessful:

19 Nagshead Place, Spring, Texas 77389.

Plaintiff respectfully request that this Court order substituted service on Sofia Hernandez. As authorized by Rule 106 of the Texas Rules of Civil Procedure, service on Defendant by the following method will be reasonably effective to give the Defendant notice of the lawsuit. Plaintiffs ask that service be made on Defendant by leaving a copy of the citation, with a copy of the petition attached, with anyone over sixteen years of age at the following address: 19



Nagshead Place, Spring, Texas 77389 or by affixing a copy of the citation, with a copy of the petition attached, to the door of 19 Nagshead Place, Spring, Texas 77389.

This manner of service will be reasonably effective in giving Defendant notice of this suit because the above specified location is Defendant's known place of business.

For these reasons, Plaintiff asks this Court to grant Plaintiff's Motion and authorize substituted service on Defendant. Plaintiff asks for any other relief to which they may be entitled.

Respectfully submitted,

THE BUZBEE LAW FIRM

By: /s/ Anthony G. Buzbee

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document has been duly served on all known counsel of record and pro se parties in accordance with the Texas Rules of Civil Procedure on May 8, 2018.

/s/ Christopher J. Leavitt

Christopher J. Leavitt