

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

XYZ Corporation,

Plaintiff,

CIVIL ACTION NO: 1:22-cv-04189

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A,”

Defendants.

**DECLARATION OF MIR Y. ALI IN SUPPORT OF PLAINTIFF’S MOTION FOR
ELECTRONIC SERVICE PURSUANT TO FED. R. CIV. P. 4(f)(3)**

I, Mir Y. Ali, state as follows:

1. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois. I am one of the attorneys for Plaintiff XYZ Corporation (“Plaintiff”). Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify as follows:

2. Upon information and belief, online marketplace operators must generally provide a valid e-mail address to customers for completing payment and/or managing their e-commerce stores. Moreover, it is necessary for online marketplace operators to provide a valid e-mail address so that their marketplaces may communicate with them regarding issues related to the purchase, transfer, and maintenance of the various accounts. Additionally, a valid email address is necessary

for online marketplace account operators for completing payment via third-party payment platforms such as PayPal.

3. Upon information and belief, unlike an e-mail address, which is typically verified by the third-party online marketplace platforms, no verification typically occurs for physical addresses. An online marketplace operator can input any physical address and, as a result, such addresses are often false and/or are not where the e-commerce store operator is located.

4. Exhibit 1 attached hereto is a true and correct copy of the unpublished decision cited in Plaintiff's Memorandum in Support of its Motion for Electronic Service of Process Pursuant to Fed. R. Civ. P. 4(f)(3).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: August 10, 2022

Respectfully submitted,

/s/ Mir Y. Ali
ArentFox Schiff LLP
233 South Wacker Drive, Suite 7100
Chicago IL 60606
312.258.5594 (direct)
mir.ali@afslaw.com
Attorneys for Plaintiff XYZ CORPORATION