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 Cal. Gov't Code § 6107

FILED
 Superior Court of California
 County of Los Angeles

AUG 13 2021

Sherri R. Carter, Executive Officer/Clerk of Court
 By Kristina Vargas Deputy

11 Attorneys for Respondent and Cross-Complainant
 12 CITY OF SAN BUENAVENTURA

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 14 COUNTY OF LOS ANGELES

15 SANTA BARBARA CHANNELKEEPER,
 16 a California non-profit corporation,
 17 Petitioner,
 18 v.
 19 STATE WATER RESOURCES
 CONTROL BOARD, etc., et al.,
 20 Respondents.

22 CITY OF SAN BUENAVENTURA, etc.,
 23 Cross-Complainant
 24 v.
 25 DUNCAN ABBOTT, an individual, et al.
 26 Cross-Defendants.

Case No. 19STCP01176
 Judge: Honorable William F. Highberger

DECLARATION OF MARNIE PROCK IN
 SUPPORT OF EX PARTE APPLICATION BY
 CROSS-COMPLAINANT CITY OF SAN
 BUENAVENTURA TO SET AN ORDER TO
 SHOW CAUSE HEARING FOR
 PUBLICATION OF SUMMONS ON HEIRS
 AND DEVEISEES OF CERTAIN DECEASED
 CROSS-DEFENDANTS AND CERTAIN
 GATED/FENCED UNSERVED CROSS-
 DEFENDANTS and AN ORDER DIRECTING
 SERVICE OF SUMMONS BY DELIVERY
 TO THE SECRETARY OF STATE FOR ONE
 CALIFORNIA CORPORATION [CCP §§
 415.50]

Filed concurrently with:
 1. Ex Parte Application to Set an Order to
 Show Cause Hearing for Publication of
 Summons and Service on Secretary of State;
 and
 2. [Proposed] Order.
 Action Filed: Sept. 19, 2014
 Trial Date: Feb. 14, 2021

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I, Marnie A. Prock, declare and state as follows:

1. I am over the age of eighteen years and a senior paralegal employed by the law firm of Best Best & Krieger LLP (“BBK”), attorneys of record for Respondent and Cross-Complainant, City of San Buenaventura (“CITY”) in the above-entitled action (“Action”).

2. I have been a paralegal in California for more than 21 years and have held various positions in two of California’s largest and most historic public law firms for more than 31 years. I have been employed by BBK since September, 2010.

3. My day to day activities include all facets of litigation, including research related to real property ownership, analyzing deeds and title reports, locating individuals and corporate entities for service of process, researching probate records for heirs and devisees, analyzing policy and procedures relating to court filings and processes, and seeking orders for publication and posting of summons when necessary for quiet title, title defect, eminent domain and prescriptive rights cases.

4. Each of the facts stated herein is within my personal knowledge, and I would so testify if called as a witness at any hearing.

5. In an effort to locate potential parties with interests at issue in this Action, I conducted extensive research into the real property record databases of the following reputable and well known title companies: Fidelity National Title Insurance Company, First American Title Insurance Company, and Chicago Title Insurance Company. In searching these databases, I identified any additional interested persons or entities, of which the CITY had a duty to serve the Summons and Third Amended Cross-Complaint.

6. Over the course of the last several months, First Legal attempted to serve all unserved Cross-Defendants including the Cross-Defendants whose heirs and devisees and the unserved Cross-Defendants behind gate and fence are part of this application.

1 7. Today, out of more than 3,000 Cross-Defendants, the only unserved Cross-
2 Defendants are these four heirs, one corporate entity in which we seek to serve the Secretary of
3 State and one unserved Cross-Defendant behind gate and fence. We recently discovered and filed
4 an amendment to the complaint as to twelve additional Cross-Defendants in which service
5 attempts are ongoing. Service as to these Cross-Defendants is not subject to this application.

6 8. For each unserved heir or devisee of deceased Cross-Defendants that are the
7 subject of this application, I researched property records and tax assessor information to ascertain
8 whether there were any property transfers to successor owners for each parcel of land. In
9 addition, information from the process server affidavits of diligence reports show that information
10 was obtained during attempted service that some Cross-Defendants were deceased. A true and
11 correct list of these four Cross-Defendants is attached hereto as Exhibit "A," and is incorporated
12 by reference herein.

13 9. For each unserved Cross-Defendants that are behind gate and fence and the subject
14 of this application, I researched property records and tax assessor information to ascertain
15 whether there were any other service addresses to provide service of process in an alternative
16 manner. Information from the process server affidavits of diligence reports show that service was
17 unsuccessful on at least three attempts to each unserved Cross-Defendant. True and correct
18 copies of the affidavits of due diligence for each of the unserved Cross-Defendants behind gate
19 and fence are attached hereto as Exhibit "B" and incorporated by reference herein.

20 10. I also research the Secretary of State records for alternate addresses and their
21 registered agent for Shanks Investment Group LLC that is one of the gated fenced Cross-
22 Defendants which is a California limited liability company. Both listed addresses on the
23 Secretary of State records are the same and behind gate and fence. A true and correct copy of the
24 Secretary of State information is attached hereto as Exhibit "C" and incorporated by reference
25 herein.

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1 11. During the course of the past year and a half, I regularly checked real estate
2 databases for changes of ownership, I conducted “TLOxp¹” searches in an attempt to locate
3 additional addresses for personal service or mail service and I researched probate records for
4 several counties for each unserved Cross-Defendant listed in Exhibit “A” which are the heirs and
5 devisees of property owners subject of this request for publication.

6 12. A comprehensive description of efforts made for each unserved deceased Cross-
7 Defendant with no known successor for which the heirs and devisees are now subject to this
8 application are below:

9 A. Irma Tracy – I received the APN number for this parcel that is adjacent to the
10 river system from the City, and I performed a search of the mailing address for
11 the property from Tax Assessor records and TLO searches. I also performed a
12 search of probate records and obituary searches over the course of eighteen
13 months to determine the location of Ms. Tracy. The Tax Assessor records
14 identify Ms. Tracy as the owner of the property, care of an individual named
15 “Geraghty” (no first name provided), and Ms. Tracy’s mailing address was in San
16 Jose, CA. However, there is no record of Ms. Tracy on TLO, which is why I
17 believe she is deceased. On April 2, 2021, I contacted the Tax Collector to
18 inquire who was paying the taxes on the property. On April 18, 2021, the Tax
19 Collector sent me records indicating there has been no bill sent to the address of
20 record for this property. In my experience in researching properties, if a tax bill is
21 not sent to a parcel it means that the parcel is generally undevelopable. I
22 reviewed aerials of the parcel, and it appears that the property is oddly configured
23 and not capable of being developed. I sent servers out to the last known mailing
24 address of record from Tax Assessor records more than three times to no avail.

25 _____
26 ¹ TLO is a database powered by TransUnion which identifies, among other items, the last several physical addresses
27 and the date in which subjects are using those addresses, telephone numbers and email addresses associated with the
28 subject. From these searches, I can glean information necessary to serve process on Cross-Defendants if within the
United States. I also performed address searches and deceased database searches to try to ascertain whether the
subject is evading or may be deceased.

1 Over the course of the last eighteen months, I performed further research on both
2 the last known residential address receiving tax bills to ascertain prior owners of
3 the property and performed further research to try to locate Irma Tracy or a
4 probate case for Ms. Tracy. That research provided no further information. I
5 performed further research on June 21, 2021 to determine whether any new
6 information could be found for Ms. Tracy. I was able to locate a tax default on
7 the property that the County of Ventura took in 1995. Out of an abundance of
8 caution, we named as Roe Cross-Defendants Ms. Tracy's heirs and devisees, and
9 are seeking an order to publish a further summons as to Ms. Tracy's heirs and
10 devisees.

11 B. Marvel Pierce - I received the APN number for this parcel that is adjacent to the
12 river system from the City, and I performed a search of the mailing address for
13 the property from Tax Assessor records and TLO searches, and probate and
14 obituary searches over the course of eighteen months to determine the location of
15 Ms. Pierce. The Tax Assessor records identify Ms. Pierce as the owner of the
16 property, and Ms. Pierce's mailing address is the Ojai address in Exhibit A. On
17 April 2, 2021, I contacted the Tax Collector to inquire who was paying the taxes
18 on the property. On April 18, 2021, the Tax Collector sent me records that
19 indicated there has been no bill sent to the address of record for this property. In
20 my experience in researching properties, if a tax bill is not sent to a parcel it
21 means that the parcel is generally undevelopable. I reviewed aerials of the parcel,
22 and it appears that it is oddly configured and not capable of being developed. I
23 sent servers out to the address of record once, and the server was informed that
24 Marvel Pierce is deceased. The service address from tax records was a residential
25 care facility where Ms. Pierce was prior to passing. I was not able to locate
26 anything regarding Ms. Pierce in probate or obituary searches. I performed
27 further research on June 21, 2021 to determine whether any new information
28 could be found for Ms. Pierce. The property has been in tax default since 1995

1 and a power to sell the property has not been exercised. Out of an abundance of
2 caution, we named as Roe Cross-Defendants Ms. Pierce's heirs and devisees and
3 herein seek an order to publish a further summons as to Ms. Pierce's heirs and
4 devisees.

5 C. Lloyd Smith – I received the APN number for this parcel that is adjacent to the
6 river system from the City, and I performed a search of the mailing address for
7 the property from Tax Assessor records and TLO searches, and probate and
8 obituary searches over the course of eighteen months to determine the location of
9 Mr. Smith. The Tax Assessor records indicate that Mr. Smith owns the property,
10 and his mailing address is a P.O. Box in Coarsegold, CA. There is no other
11 known mailing address, and TLO research yielded hundreds of individuals with
12 the same name. On April 2, 2021, I contacted the Tax Collector to inquire who
13 was paying the taxes on the property. On April 18, 2021, the Tax Collector sent
14 me records that indicated there has been no bill sent to the address of record for
15 this property. In my experience in researching properties if a tax bill, is not sent
16 to a parcel it means that the parcel is generally undevelopable. I reviewed aerials
17 of the parcel, and it appears that it is oddly configured and not capable of being
18 developed. While there is no address at the site, I sent a process server to the site,
19 but that was to no avail, as there is no address. I also performed Westlaw research
20 on June 21, 2021 to determine whether any new information could be found for
21 Mr. Smith as to possible probate actions. That research resulted in three possible
22 probate actions under the estate of Lloyd Smith, all three of which were in Los
23 Angeles County. I did not see any other probate actions under that name in
24 Southern California. On June 21, 2021, I sent First Legal instructions to copy the
25 probate files for each of the three actions. I have received and reviewed such
26 files: for the first file, I reviewed the documents and determined that property in
27 Ojai, California was not in the inventory of the estate to be distributed; for the
28 second and third file, I reviewed the document provided and was unable to

1 ascertain the inventory of the estate to be distributed – the court only had a
2 document appointing a Leroy Greer as the personal representative of the estate of
3 the Lloyd Smith Jr. estate for one action and the other action was distributed
4 privately. Out of an abundance of caution, we named as Roe Cross-Defendants
5 Mr. Smith’s heirs and devisees and herein seek an order to publish a further
6 summons as to Mr. Smith’s heirs and devisees.

7 D. William Lowes - I received the APN number for this parcel that is adjacent to the
8 river system from the City, and I performed a search of the mailing address for
9 the property from Tax Assessor records and TLO searches, and probate and
10 obituary searches over the course of eighteen months to determine the location of
11 Mr. Lowes. The Tax Assessor records indicate that Mr. Lowes owns the
12 property, and his mailing address is a P.O. Box in Alturas, CA. There is no other
13 known mailing address, and TLO research yielded that a gentleman named
14 William Lowes with the same P.O. Box in Alturas is deceased, passing on March
15 13, 2014. On April 2, 2021, I contacted the Tax Collector to inquire who was
16 paying the taxes on the property. On April 18, 2021, the Tax Collector sent me
17 records that indicated there has been no bill sent to the address of record for this
18 property. In my experience in researching properties, if a tax bill is not sent to a
19 parcel it means that the parcel is generally undevelopable. I reviewed aerials of
20 the parcel, and it appears that it is oddly configured and not capable of being
21 developed. I sent servers to the P.O. Box address, as there is no site address, and
22 on January 17, 2020, servers were told by a clerk at the post office in Alturas,
23 California which is the last known address of record according to the tax assessor,
24 that Mr. Lowes had passed away a few years ago. I performed Westlaw research
25 on June 21, 2021 to determine whether any new information could be found for
26 Mr. Lowes, including any probate actions. No such records were located. Out of
27 an abundance of caution, we named as Roe Cross-Defendants Mr. Lowe’s heirs
28 and devisees and herein seek an order to publish a further summons as to Mr.

1 Lowe's heirs and devisees.

2 13. On August 4, 2021, I prepared and caused to have sent an overnight mailing
3 package which included all service of process documents, a notice and acknowledgment of
4 receipt and a return envelope to Shanks Investment Group, LLC at the address of record for such
5 gated/fenced Cross-Defendant. Shanks Investment Group, LLC's registered agent is Brenda
6 Shanks and the address given by Secretary of State is property that is gated and fenced. A true
7 and correct copy of the information available on the Secretary of State website is attached hereto
8 and incorporated herewith as Exhibit "C". The overnight delivery receipt for Shanks Investment
9 Group LLC, is attached hereto and incorporated herewith as Exhibit "D".

10 14. On August 11, 2021, I prepared and caused to have sent an overnight mailing
11 package which included all service of process documents, a notice and acknowledgment of
12 receipt and a return envelope to Ole Behrendtsen at the address of record for such gated/fenced
13 Cross-Defendant. The overnight delivery receipt for Ole Behrendtsen is attached hereto and
14 incorporated herewith as Exhibit "E."

15 15. As of the date of this Declaration, the unserved Cross-Defendants that were sent
16 notices and acknowledgments of receipt through this order to show cause proceeding have 20
17 days in which to return their signed notices.

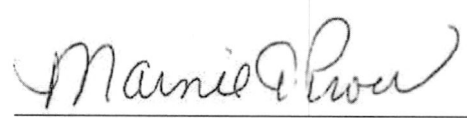
18 16. If Notices and Acknowledgment of Receipts are received after the Proposed Order
19 is signed, the City shall remove those Cross-Defendants prior to publication or service on the
20 Secretary of State.

21 17. Upon expiration of the 22nd day after overnight delivery, I shall cause to have the
22 signed order, if approved by the Court, submitted to the *Ventura County Star* to start publication
23 of the five unserved Cross-Defendants that have been served through this order to show cause
24 proceeding and promptly submit to the Court the proof of publication pursuant to code. In
25 addition I shall cause to have the signed order, if approved by the Court, along with a full service
26 package, served on behalf of Shanks Investment Group LLC on the Secretary of State.

27 18. The *Ventura County Star* is a newspaper of general circulation published and
28 distributed in Ventura County, where the Property is located, and which is most likely to give

1 actual notice of the pendency of the proceedings herein to the unserved heirs and devisee Cross-
2 Defendants.

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4 I declare under penalty of perjury under the laws of the State of California that the
5 foregoing is true and correct, and that this declaration was executed on August 13, 2021, at
6 Stockton, California.

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8 Marnie Prock

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EXHIBIT A

EXHIBIT A

Heirs and devisees of Marvel Pierce, Roe 422	Unknown successor– Service by Publication
Heirs and devisees of Lloyd Smith, Roe 423	Unknown successor– Service by Publication
Heirs and devisees of William Lowes, Roe 424	Unknown successor– Service by Publication
Heirs and devisees of Irma Tracy, Roe 425	Unknown successor– Service by Publication
Shanks Investment Group, LLC	Gated/Fenced – Service by Delivery on Secretary of State
Ole Behrendtsen	Gated/Fenced – Service by Publication

EXHIBIT B-1

<i>Attorney or Party without Attorney:</i> Christopher M. Pisano (#192381) BEST BEST & KRIEGER 300 S Grand Ave 25th Floor Los Angeles, CA 90071 Telephone No: 213-617-8100 Attorney For: Cross-Complainant				For Court Use Only	
				<i>Ref. No. or File No.:</i> 82470.00018	
<i>Insert name of Court, and Judicial District and Branch Court:</i> SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES					
<i>Plaintiff:</i> SANTA BARBARA CHANNELKEEPER <i>Defendant:</i> STATE WATER RESOURCES CONTROL BOARD, et al					
AFFIDAVIT OF DUE DILIGENCE		<i>Hearing Date:</i>	<i>Time:</i>	<i>Dept/Div:</i>	<i>Case Number:</i> 19STCP01176

- I, Janos Wohner 605 Ventura County, and any employee or independent contractors retained by FIRST LEGAL are and were on the dates mentioned herein over the age of eighteen years and not a party to this action. Personal service was attempted on subject Ole Behrendtsen as follows:
- Documents:* Letter Dated February 3, 2021; Summons; Notice of Adjudication - English; Notice of Adjudication - Spanish; Form Answer approved for use by Cross-Defendants; Summons; 3rd Amended Cross-Complaint; ADR Package; 7/2 Notice of Ruling; Channelkeeper Complaint; City Answer to Channelkeeper Complaint; State Board Answer to Channelkeeper Complaint

Attempt Detail

- 1) Unsuccessful Attempt by: Janos Wohner (605 Ventura County) on: Mar 31, 2021, 5:41 pm PDT at 1420 S La Luna Ave, Ojai, CA 93023
Gated property no access to the house
- 2) Unsuccessful Attempt by: Janos Wohner (605 Ventura County) on: April 3, 2021, 10:04 am PDT at 1420 S La Luna Ave, Ojai, CA 93023
Gated property no access to the house
- 3) Unsuccessful Attempt by: Janos Wohner (605 Ventura County) on: Apr 7 2021, 7:32 pm PDT at 1420 S La Luna Ave, Ojai, CA 93023
Gated property no access to the house



AFFIDAVIT OF
DUE DILIGENCE

5512330
(8678656)
Page 1 of 2

Attorney or Party without Attorney: Christopher M. Pisano (#192381) BEST BEST & KRIEGER 300 S Grand Ave 25th Floor Los Angeles, CA 90071 Telephone No: 213-617-8100 Attorney For: Cross-Complainant				For Court Use Only 	
		Ref. No. or File No.: 82470.00018			
Insert name of Court, and Judicial District and Branch Court: SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES					
Plaintiff: SANTA BARBARA CHANNELKEEPER Defendant: STATE WATER RESOURCES CONTROL BOARD, et al					
AFFIDAVIT OF DUE DILIGENCE		Hearing Date:	Time:	Dept/Div:	Case Number: 19STCP01176

Recoverable cost Per CCP 1033.5(a)(4)(B)

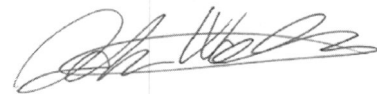
3. Person who served papers

- a. Name: Janos Wohner
- b. Address: **FIRST LEGAL**
1517 W. Beverly Blvd.
LOS ANGELES, CA 90026
- c. Telephone number: (213) 250-1111
- d. The fee for service was: \$125.00
- e. I am:
 - (1) not a registered California process server.
 - (2) exempt from registration under Business and Professions Code section 22350(b).
 - (3) a registered California process server:
 - (i) owner employee independent contractor
 - (ii) Registration No: 605
 - (iii) County: Ventura

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

06/10/2021

(Date)



Janos Wohner



EXHIBIT B-2

<i>Attorney or Party without Attorney:</i> Christopher M. Pisano (#192381) BEST BEST & KRIEGER 300 S Grand Ave 25th Floor Los Angeles, CA 90071 Telephone No: 213-617-8100 Attorney For: Cross-Complainant				For Court Use Only	
<i>Ref. No. or File No.:</i> 82470.00018					
<i>Insert name of Court, and Judicial District and Branch Court:</i> SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES					
<i>Plaintiff:</i> SANTA BARBARA CHANNELKEEPER <i>Defendant:</i> STATE WATER RESOURCES CONTROL BOARD, et al					
AFFIDAVIT OF DUE DILIGENCE		<i>Hearing Date:</i>	<i>Time:</i>	<i>Dept/Div:</i>	<i>Case Number:</i> 19STCP01176

1. I, Troy Norriss 681, Ventura County, and any employee or independent contractors retained by FIRST LEGAL are and were on the dates mentioned herein over the age of eighteen years and not a party to this action. Personal service was attempted on subject Shanks Investment Group, LLC as follows:
2. *Documents:* Letter Dated February 3, 2021; Summons; Notice of Adjudication - English; Notice of Adjudication -Spanish; Form Answer approved for use by Cross-Defendants; Summons; 3rd Amended Cross-Complaint; ADR Package; 7/2Notice of Ruling; Channelkeeper Complaint; City Answer to Channelkeeper Complaint; State Board Answer to ChannelkeeperComplaint

Attempt Detail

- 1) Unsuccessful Attempt by: Troy Norriss (681, Ventura County) on: Aug 4, 2021, 7:53 pm PDT at 2845 Hermitage Rd, Ojai, CA 93023
Gated, Locked, No Access, Keypad locked. Took Photos
- 2) Unsuccessful Attempt by: Troy Norriss (681, Ventura County) on: Aug 7, 2021, 9:15 am PDT at 2845 Hermitage Rd, Ojai, CA 93023
gated no access
- 3) Unsuccessful Attempt by: Troy Norriss (681, Ventura County) on: Aug 10, 2021, 2:45 pm PDT at 2845 Hermitage Rd, Ojai, CA 93023
location gated no access



<i>Attorney or Party without Attorney:</i> Christopher M. Pisano (#192381) BEST BEST & KRIEGER 300 S Grand Ave 25th Floor Los Angeles, CA 90071 Telephone No: 213-617-8100 Attorney For: Cross-Complainant				For Court Use Only	
<i>Ref. No. or File No.:</i> 82470.00018					
<i>Insert name of Court, and Judicial District and Branch Court:</i> SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES					
<i>Plaintiff:</i> SANTA BARBARA CHANNELKEEPER <i>Defendant:</i> STATE WATER RESOURCES CONTROL BOARD, et al					
AFFIDAVIT OF DUE DILIGENCE		<i>Hearing Date:</i>	<i>Time:</i>	<i>Dept/Div:</i>	<i>Case Number:</i> 19STCP01176

Recoverable cost Per CCP 1033.5(a)(4)(B)

3. Person who served papers

- a. Name: Troy Norriss
- b. Address: **FIRST LEGAL**
1517 W. Beverly Blvd.
LOS ANGELES, CA 90026
- c. Telephone number: (213) 250-1111
- d. **The fee** for service was:
- e. I am:
 - (1) not a registered California process server.
 - (2) exempt from registration under Business and Professions Code section 22350(b).
 - (3) a registered California process server:
 - (i) owner employee independent contractor
 - (ii) Registration No: 681, Ventura County
 - (iii) County: Ventura County

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

08/11/2021

(Date)



(Signature)



EXHIBIT C

Dr. Shirley N. Weber
California Secretary of State

Business Search - Entity Detail

The California Business Search is updated daily and reflects work processed through Thursday, August 12, 2021. Please refer to document [Processing Times](#) for the received dates of filings currently being processed. The data provided is not a complete or certified record of an entity. Not all images are available online.

200716410292 SHANKS INVESTMENT GROUP, LLC

Registration Date:	06/12/2007
Jurisdiction:	CALIFORNIA
Entity Type:	DOMESTIC
Status:	ACTIVE
Agent for Service of Process:	BRENDA SHANKS 2845 HERMITAGE ROAD OJAI CA 93023
Entity Address:	2845 HERMITAGE ROAD OJAI CA 93023
Entity Mailing Address:	2845 HERMITAGE ROAD OJAI CA 93023
LLC Management	One Manager

 [Certificate of Status](#)

A Statement of Information is due EVERY ODD-NUMBERED year beginning five months before and through the end of June.

Document Type	File Date	PDF
SI-COMplete	04/12/2021	
SI-COMplete	04/20/2016	
REGISTRATION	06/12/2007	

* Indicates the information is not contained in the California Secretary of State's database.

Note: If the agent for service of process is a corporation, the address of the agent may be requested by ordering a status report.

- For information on checking or reserving a name, refer to [Name Availability](#).
- If the image is not available online, for information on ordering a copy refer to [Information Requests](#).
- For information on ordering certificates, status reports, certified copies of documents and copies of documents not currently available in the Business Search or to request a more extensive search for records, refer to [Information Requests](#).
- For help with searching an entity name, refer to [Search Tips](#).
- For descriptions of the various fields and status types, refer to [Frequently Asked Questions](#).

[Modify Search](#)

[New Search](#)

[Back to Search Results](#)

EXHIBIT D

Marnie Prock

From: UPS <pkginfo@ups.com>
Sent: Thursday, August 5, 2021 11:47 AM
To: Marnie Prock
Subject: UPS Delivery Notification, Tracking Number 1Z0047350198751906

CAUTION - EXTERNAL SENDER.



Hello, your package has been delivered.

Delivery Date: Thursday, 08/05/2021

Delivery Time: 11:45 AM

Left At: MET CUST MAN

Experience UPS My Choice® Premium Today

Be in total control of how, when and where your packages are delivered.

[Upgrade to Premium Now](#)



[Set Delivery Instructions](#)

[Manage Preferences](#)

[View My Packages](#)

BEST BEST & KRIEGER LLP

Tracking Number:	1Z0047350198751906
Ship To:	SHANKS INVESTMENT, LLC 2845 HERMITAGE LN OJAI, CA 930239650 US
Number of Packages:	1
UPS Service:	UPS Next Day Air®
Package Weight:	0.0 LBS
Reference Number:	82470.00018.1555



[Download the UPS mobile app](#)

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EXHIBIT E

Marnie Prock

From: UPS <pkginfo@ups.com>
Sent: Thursday, August 12, 2021 10:01 AM
To: Marnie Prock
Subject: UPS Delivery Notification, Tracking Number 1Z0047350195245718

CAUTION - EXTERNAL SENDER.



Hello, your package has been delivered.

Delivery Date: Thursday, 08/12/2021

Delivery Time: 9:59 AM

Left At: PORCH

Experience UPS My Choice® Premium Today

Be in total control of how, when and where
your packages are delivered.

[Upgrade to Premium Now](#)



[Set Delivery Instructions](#)

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