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7 Pro Se Plaintiff

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **IN AND FOR THE COUNTY OF SANTA CLARA**
10 **UNLIMITED JURISDICTION**

11
12 MARK CHRISTOPHER TRACY, an
individual,

13 Plaintiff,

14 v.

15 COHNE KINGHORN PC, a Utah Professional
Corporation; SIMPLIFI COMPANY, a Utah
16 Corporation; JEREMY RAND COOK, an
individual; ERIC HAWKES, an individual;
17 JENNIFER HAWKES, an individual;
18 MICHAEL SCOTT HUGHES, an individual;
DAVID BRADFORD, an individual; KEM
19 CROSBY GARDNER, an individual; WALTER
J. PLUMB III, an individual; DAVID
20 BENNION, an individual; R. STEVE
CREAMER, an individual PAUL HANDY
21 BROWN, an individual; GARY A. BOWEN, an
individual

22 Defendants.
23

Case No.: 23CV423435

Honorable Evette D. Pennypacker
[Dept. 6]

**SUPPLEMENTAL DECLARATION OF
MARK CHRISTOPHER TRACY IN
SUPPORT OF REPLY TO DEFENDANTS'
OPPOSITION TO MOTION TO
RECONSIDER ORDER GRANTING
MOTIONS TO QUASH SERVICE OF
PROCESS FOR LACK OF PERSONAL
JURISDICTION**

Hearing Date: March 26, 2024
Time: 09:00 am (PST)

Action Filed: September 21, 2023
Trial Date: TBD

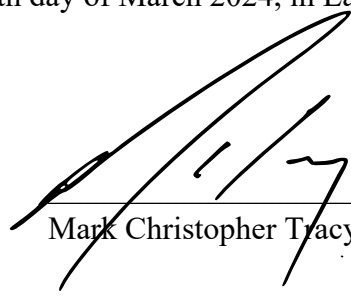
24 I, Mark Christopher Tracy, declare as follows:

- 25 1. I am party to the action herein. I am over the age of eighteen and competent to testify. I have personal
26 knowledge of the information set forth below, unless noted as information and belief, all of which is
27 true and correct of my own personal knowledge, and if called to testify, I would competently testify
28 thereto;

- 1 2. Attached as **Exhibit** hereto is a true and correct copy of a screenshot dated March 6, 2024, at 06:01
2 AM, of the Utah Division of Corporations and Commercial Code business records search at the
3 website <https://secure.utah.gov/bes/index.html> listing KC Gardner Company, L.C. as sole manager
4 of “rPlus Energies LLC.”
- 5 3. During the meet and confer telephone conference on February 27, 2024, at 09:00 AM PST, attorney
6 of record Miguel E. Mendez-Pintado refused to submit an amended declaration of his client
7 affirming under penalty of perjury that at no time did Defendant Paul Handy Brown reside at 8214
8 Quoite St, Downey, California 90242.

9 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and
10 correct. This Declaration was executed on this 18th day of March 2024, in La Jolla, California.

11 //
12 //



Mark Christopher Tracy

EXHIBIT

Registered Principals

Name	Type	City	Status
RPLUS ENERGIES, LLC	Limited Liability Company	SALT LAKE CITY	Active
Position	Name	Address	
Manager	KC GARDNER COMPANY, L.C.	201 S MAIN ST 84111	SALT LAKE CITY UT
Registered Agent	CHRISTIAN GARDNER	201 S MAIN ST STE 2000	Salt Lake City UT 84111

If you believe there may be more principals, click here to [View Filed Documents](#) [View Filed Documents](#)

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