

The Honorable James L. Robart

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation, AMAZON.COM SERVICES LLC, a Delaware limited liability company, and AMAZON TECHNOLOGIES, INC., a Nevada corporation,

Plaintiffs,

v.

Does 1-20, unknown parties doing business as “REKK,” and the following individuals: Domantas Radeckas, Noah Page, Skylar Robinson, Luke Colvin, Alejandro Taveras, Andrew Ling, Brandon Sukhram, Cosmin Sopca, Jenny Tran, Olaf Booij, and Ryan Bates,

Defendants.

No. 2:23-cv-01879-JLR

PLAINTIFFS’ STATUS REPORT

Plaintiffs Amazon.com, Inc., Amazon.com Services LLC, and Amazon Technologies, Inc., (“Amazon”) submit this Status Report in accordance with the Court’s April 16, 2024 Order. Dkt. 77. In the last 60 days, Amazon has made great strides in unmasking the operators behind REKK. Amazon has filed an Amended Complaint, Dkt. 89, naming Domantas Radeckas as the primary operator of REKK and revealing his new refund fraud operation named DIVO. Furthermore, Amazon has begun productive settlement discussions with two of the remaining 6

1 unserved defendants, reaching an agreement in principle with one. Amazon will work diligently
2 to serve the remaining unserved defendants with the Amended Complaint and to unmask any
3 remaining REKK Operator Defendants.

4 **A. Unmasking of Domantas Radeckas and Filing of the Amended Complaint**

5 Amazon investigators reviewed the information received from the subpoena responses
6 received from Google, Reddit, Pentagon, Federal Credit Union, and PayPal. Following that
7 review, Amazon discovered at least one REKK Operator Defendant, Domantas Radeckas, who
8 resides in Lithuania. Amazon also discovered that Domantas Radeckas resumed his fraudulent
9 activities as DIVO. On June 13, 2024, Amazon filed its Amended Complaint, naming Domantas
10 Radeckas and including information regarding DIVO's activities. Dkt. 89. Within an hour of
11 filing, both DIVO's Telegram channels were wiped. Declaration of Macaulay Ivory ("Ivory
12 Decl.") ¶2.

13 **B. Efforts to Identify Unnamed Defendants**

14 As to Does 1-20, Amazon intends to file another Motion for Expedited Discovery to
15 uncover the identities of any remaining REKK Operator Defendants. During its investigation,
16 Amazon uncovered additional email addresses and bank accounts that may uncover Domantas
17 Radeckas's co-conspirators.

18 As discussed in Amazon's Response to Show Cause Order, Amazon has identified
19 individuals linked to accounts transferring money to facilitate the scheme. One of those
20 individuals is located in a country that is not a signatory to The Convention on the Taking of
21 Evidence Abroad in Civil or Commercial Matters, which complicates Amazon's investigation.
22 Nevertheless, Amazon believes that individual possesses information regarding other potential
23 REKK Operator Defendants and is continuing its investigation.

24 **C. Current Procedural Status of Case Against the 27 Named Defendants**

25 **1. 20 Defendants Served and/or Resolved**

26 Amazon has resolved its claims with 16 individual defendants, including Charalampos
27 Gkatzoulas. *See* Ivory Decl. ¶ 3.

1 Amazon served and moved for entry of default against 5 individual defendants,¹ which
2 this Court granted on January 31, 2024. Dkt. 27. Amazon believed it had a settlement
3 agreement with Ryan Bates; however, Bates breached the agreement and Amazon moved for an
4 entry of default, which this Court granted on May 16, 2024. Ivory Decl. ¶ 4; Dkt. 88. Amazon
5 is continuing to conduct discovery and intends on moving for final judgment once that is
6 complete.

7 2. 6 Defendants Awaiting Service

8 Amazon has not yet served the remaining 6 individual defendants, who are made up of 4
9 E.U.-based defendants and 2 U.S.-based defendants.

10 On December 13, 2023, Amazon initiated service under The Convention on the Service
11 Abroad of Judicial and Extrajudicial Documents (“The Convention”) to the respective Hague
12 ministries on the following 4 E.U.-based defendants: Charalampos Gkatzoulas, Cosmin Sopca,
13 Jenny Tran, and Olaf Booij. Ivory Decl. ¶ 5. Amazon will need to reinitiate service under The
14 Convention to serve the Amended Complaint and will send the remaining international
15 defendants requests for waivers of service of summons. Amazon has an agreement in principle
16 with Mr. Gkatzoulas and has had productive settlement discussions with Ms. Tran. Amazon
17 anticipates entering stipulated injunctions and voluntary dismissals for those two defendants
18 within the next 60 days.

19 As to the 2 U.S.-based defendants, Amazon has unsuccessfully attempted service on the
20 other two (Luke Colvin and Andrew Ling) multiple times. Amazon attempted to serve Luke
21 Colvin on December 13, 2023, January 3, 2024, June 7, 2024, and June 10, 2024, at three
22 separate addresses. *Id.* at ¶ 7. Amazon attempted to serve Andrew Ling on December 13, 2023,
23 and April 16, 2024 at four separate addresses. *Id.* at ¶ 7. From these attempts, Amazon learned
24 that Defendant Colvin moved out of state and currently attends Olivet Nazarene University in
25 Bourbonnais, Illinois, and Defendant Ling also moved and his current physical addresses is
26 currently unknown. *Id.* Amazon is working with the process servers, and will likely initiate

27 ¹ Dylan Hinz, Brandon Sukhram, Alejandro Taveras, Noah Page, and Skylar Robinson.

1 service of the Amended Complaint at his university through the local sheriff's department within
2 30 days. *Id.* Amazon will continue to investigate for options to serve Andrew Ling.

3 To the extent that the 6 remaining named Defendants cannot be served in a timely fashion
4 and cannot be located, Amazon anticipates that it will move for permission to serve them via
5 alternative means, such as email.

6 DATED this 17th day of June, 2024.

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23 I certify that this memorandum contains 770
24 words, in compliance with the Local Civil
25 Rules.
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