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Attorney for Plaintiffs

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6 **IN THE UNITED STATES DISTRICT COURT**
WESTERN DISTRICT OF WASHINGTON
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8 PAUL GANCARZ, an individual;) Case No. 2:23-cv-1113
9 DANIEL TURETCHI, an individual;)
COLTON BROWN, an individual;) **DECLARATION OF**
10 JAMES JOHNSON and AMELIA) **CHRISTOPHER HOGUE RE:**
JOHNSON, individually and husband)
and wife,) **PLAINTIFFS' RENEWED**
11) **MOTION FOR ALTERNATIVE**
Plaintiffs,) **SERVICE**
12)
vs.)
13)
DAVID ALAN CAPITO II, aka)
14 VYACHESLAV ARKANGELSKIY,)
an individual,)
15)
Defendant.)

16 I, CHRISTOPHER HOGUE, declare as follows:

17 1. I am over the age of eighteen, competent to testify in the above-
18 entitled matter, and make this declaration on my own personal knowledge. I am
19 one of the attorneys for Plaintiffs in this matter.

20 **DECLARATION OF CHRISTOPHER HOGUE**
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1 2. Subsequent to private investigator Stephen Robinson’s attempts to call
2 the phone numbers that he developed for Defendant, I also made attempts to call
3 these numbers to check them.

4 3. When I called the (206) 866-4451 phone number for Defendant, I was
5 met with the same situation as Mr. Robinson – a call that went directly to a busy
6 signal.

7 4. When I called the (425) 689-4095 phone number for Defendant, I was
8 met with a different situation from what Mr. Robinson experienced. During my
9 attempt, this number did not ring and go to a loud, extended beep like it did for Mr.
10 Robinson. Instead, my call to the number went directly to a busy signal like with
11 the 206 area code number.

12 5. This change in how the 425 area code phone number for Defendant is
13 operating is significant.

14 6. Based upon this change, I have a good faith belief that Defendant has
15 blocked calls, diverted calls, shut off his phone, or discontinued service for this
16 phone in an effort to conceal himself in the State and avoid service of process for
17 this lawsuit.

18 7. Attached as Exhibit A is the proposed Summons by Publication in
19 compliance with RCW 4.28.110.

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

3 DATED this 26th day of September 2024.

4 *s/ Christopher Hogue* _____
5 CHRISTOPHER HOGUE

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20 DECLARATION OF CHRISTOPHER HOGUE

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CM/ECF CERTIFICATE OF SERVICE

I certify that on the date indicated below I caused an electronic copy of the foregoing document to be filed with the Clerk of the Court via CM/ECF system which will then send notification of such filing to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

DATED this 26th day of September 2024.

s/ Christopher M. Hogue
Attorney for Plaintiffs