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8 **UNITED STATES DISTRICT COURT**  
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

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11 RIC (SAN LEANDRO) LLC, a California  
12 limited liability company,

13 Plaintiff,

14 v.

15 BRUCE DOUGLAS MILLER, an individual  
and Wyoming resident, PATRICK JOHN  
16 KOENTGES, an individual and Colorado  
resident, KENNETH EDWARD GREER, an  
17 individual and Colorado resident, GREEN  
SAGE, LLC, a Colorado limited liability  
18 company,

19 Defendants.

Case No. 3:23-cv-01501-SK

**DECLARATION OF WILLIAM  
MURDOCH IN SUPPORT OF  
PLAINTIFF’S RENEWED MOTION  
FOR ORDER AUTHORIZING SERVICE  
OF DEFENDANTS BRUCE DOUGLAS  
MILLER AND KENNETH EDWARD  
GREER BY PUBLICATION**

**[Fed R.Civ.P. 4(e)(1)]**

*[Filed contemporaneously with Notice of  
Motion and Memorandum of Points and  
Authorities; Declaration of Olivia J. Scott;  
and [Proposed] Order]*

Hon. Sallie Kim, Courtroom C

Date: August 21, 2023

Time: 9:30 a.m.

Courtroom: C

BRYAN CAVE LEIGHTON PAISNER LLP  
1920 MAIN STREET, SUITE 1000  
IRVINE, CA 92614-7276

**DECLARATION OF BILL MURDOCH**

I, William Murdoch, declare as follows:

1. I am a duly licensed private investigator located in the state of California. On or around May 9, 2023, I was engaged by Plaintiff RIC (San Leandro) LLC, (“**Plaintiff**”) to locate Bruce Miller and Ken Greer in order for Plaintiff to effectuate service of process. I have personal knowledge of the matters set forth in this Declaration. If called as a witness, I could testify competently to them.

2. Upon my engagement, I conducted the following searches: (1) searched public databases to locate address for these individuals; (2) cross-referenced known family members to determine current residences; (3) ran license plates numbers of vehicles parked outside addresses associated with either Defendant; and (4) conducted searches for driver’s licenses potentially linked to either Defendant.

3. As a result of the foregoing investigations, I confirmed that 125 S. King St. Suite 2A, Jackson, Wyoming and 10669 Gee Norman Rd., Belgrade, Montana addresses are associated with Mr. Miller, and 8120 El Paseo Grande, La Jolla, California is associated with Mr. Greer.

4. On or about May 22, 2023, I identified the personal cell phone number for Defendant, Mr. Ken Greer, and I made a phone call to that number. When Mr. Greer answered that May 22 phone call, I stated, “Hi, is this Kenny?” to which Mr. Greer said “Yes.” I then introduced myself as a licensed private investigator in possession of legal documents that I needed to serve on Mr. Greer. Mr. Greer then interrupted me, said, “I’m sorry,” and promptly disconnected the call.

5. I followed up the May 22 phone call by sending a text message that same day to the same phone number identified as Mr. Greer’s personal cell phone stating: “Just hear me out, please. We can meet at a coffee shop of your choice in La Jolla. I’m trying to be discrete.” As of the date of this Motion, Mr. Greer never responded to my text message.

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I declare under penalty of perjury under the laws of the State of California that the foregoing facts are true and correct.

Executed on this 7th day of June, 2023, at Irvine, California.

  
William Murdoch

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