STATE OF NORTH CAROLINA	IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION
COUNTY OF MECKLENBURG	Case No.: 3:24-cv-01002

SALLAMONDRA ROBINSON, INDIVIDUALLY AND AS PERSONAL REPRESENTATIVE OF THE ESTATE OF SHANQUELLA ROBINSON, DECEASED.

Plaintiff,

v.

E'MANI GREEN, ALYSSE HYATT, MALIK DYER, WENTER DONOVAN, KHALIL COOKE, NAZEER TYREE WIGGINS, UNITED STATES DEPARTMENT OF STATE, AND THE FEDERAL BUREAU OF INVESTIGATION,

Defendants.

_____/

PLAINTIFF'S OPPOSITION TO DEFENDANT EMANI GREEN'S MOTION TO DISMISS

COMES NOW, Plaintiff, by and through undersigned counsel, serves this Opposition to Defendant E'Mani Green's Motion to Dismiss. As support for the Plaintiff's Opposition, the Plaintiff states the following:

In Defendant's Amended Answer, dated July 9, 2025, the defense of improper service is mentioned in a subsection titled "Motion to Dismiss". Def. Amended Answer at 1, DE 59. Additionally, the Defendant raises the following affirmative defenses: statute of limitations[1],

[1] The statute of limitations has not run, pursuant to G.S. 28A-18-2.

laches, assumption of the risk, contributory/comparative negligence, and self defense. *Id*. at 3. Defendant has not filed a separate motion to dismiss on improper service grounds with supplemental briefing, as required by LCv.R 7.1. Defense Counsel acknowledges this requirement in the Amended Answer. Def. Amended Answer at 1, DE 59. In an abundance of caution, Plaintiff has filed this opposition to preserve all objections and arguments to the Defendant's motion. In the event Defendant Green files the required supplemental brief with any support for her position, Plaintiff requests permission to offer responsive briefing.

BACKGROUND

On November 14, 2024, Plaintiff's Complaint was removed to this Honorable Court. Shortly after filing the Verified Complaint, Plaintiff was notified that the individual known to the parties as Daejhanae Jackson changed her name to E'Mani Green. Accordingly, the Plaintiff amended the Complaint to reflect the Defendant's new name. The first summons for Defendant Green was issued on December 30, 2024, and included her last known North Carolina address: 3023 Sherill Avenue, Jamestown, NC 27282. *See* Summons issued to E'Mani Green, DE 23 (Dec. 30, 2024). A subsequent summons was issued on January 30, 2025, and included Defendant Green's last known Connecticut address: 221 Grandview Terrace, Hartford, CT 06114. *See* Summons issued to E'Mani Green, DE 31 (Jan. 30, 2025). Despite having this Connecticut address, Defendant Green owned and operated a 2018 Honda Accord.

Several attempts were made to serve Defendant Green in North Carolina and Connecticut, but process servers in both states encountered several impediments. On April 14, 2025, after days of surveillance at the Hartford, Connecticut address, private process server Raymond Ranno of Ranno Investigative Services observed Defendant Green's 2018 Honda Accord parked in the driveway. *See* Exhibit A (Ranno Investigative Services Investigative

Report). However, Defendant Green was not observed in the vehicle or exiting the Connecticut home, after hours of surveillance. *Id*. Mr. Ranno's investigation revealed Defendant Green traveled frequently between Connecticut and North Carolina in 2025. *Id*.

Private process server Houssam Atassi, an agent of Caplan, Caplan & Caplan Process Services verified Defendant Green's address in North Carolina. After multiple failed attempts to serve Defendant Green in North Carolina, the process server effectuated substitute service on May 7, 2025. As stated in the affidavit of service, a copy of the Complaint and Summons was served at 3023 Sherill Avenue, Jamestown, NC 27282, on a co-resident, Mrs. Tammy Gordon, who is over the age of eighteen. *See* Exhibit B (Affidavit of Service). Mrs. Gordon confirmed that E'Mani Green was a resident of the home and accepted the documents. *Id*.

Defendant Green received the Summons, Complaint, and attached exhibits. Within 42 days of receiving the Complaint and attached documents, Defendant Green filed a Pro Se 3 Form on June 16, 2025. Def. Answer, DE 55. On the first page of the Pro Se 3 Form, Defendant Green provided the following address: 221 Grandview Terrace, Hartford, CT 06114. Def. Answer at 1, DE 55. This is the same address that the process server surveilled for over 2 weeks without seeing Defendant Green enter or exit. *See* Ex. A. On the second page of the Pro Se 3 Form, Defendant writes, "the manner of service of the summons and complaint was insufficient and did not comply with the requirements. The service was effectuated on May 7, 2025 and served to a party who is not the defendant at an address that the defendant does not reside." Def. Answer at 2, DE 55. Defendant Green also claimed the Plaintiff's Wrongful Death claim is barred by the statute of limitations. *Id*. at 3. Defendant Green did not attach any additional documents to support either assertion. *Id.*

ARGUMENT

Good Cause Exists For Extending The Time For Serving Defendant E'mani Green.

The Amended Complaint should not be dismissed because good cause exists for extending the specified time for serving Defendant Green. Pursuant to Fed. R. Civ. P. 4, if the plaintiff demonstrates good cause for effectuating service after ninety days, the Court "must extend the time for service for an appropriate period". Under LCv.R 7.1, a brief must be filed contemporaneously with a motion to dismiss.

Here, the Motion to Dismiss should be denied for several reasons. *First*, this Court should not consider the Defendant's motion to dismiss, because no brief has been filed, in violation of the local rules. Briefing provides this Court and the opposing party clarity on the underlying arguments and supporting authority for the Defendant's position. *Second*, notwithstanding the procedural issues with the Defendant's Motion, the motion is substantively lacking, and should be denied.

Despite her best efforts, the Plaintiff effectuated service after the 90 day deadline, due to the Defendant's evasive tactics.[2] In an effort to prevent the Plaintiff from having her day in court and getting much needed answers about her daughter's killing, Defendant Green went to great lengths to dodge service. Defendant Green has changed her name and maintained multiple places of residence in different states, since the murder of Shanquella Robinson. Nevertheless, the Plaintiff earnestly and deliberately attempted to serve the Defendant in accordance with all applicable rules.

[2] As stated in the Verified Amended Complaint, Defendant Green has intentionally evaded accountability for the death of Shanquella Robinson since the inception of this matter. Amended Compl. at ℙℙ 65-70, DE 6. Defendant Green left Mexico to avoid participating in the Mexican authorities' investigation. *Id*. Documents recently received from the FBI reveal Defendant Green was also unresponsive to the agency.

Failed attempts to serve Defendant Green in Connecticut and evidence of her spending extended periods of time in North Carolina led the Plaintiff to attempt to serve Defendant Green in North Carolina. F.R.Civ.P. 4(e)(2)(B) allows service by leaving "a copy of (the Complaint and Summons) at the individual's dwelling or usual place of abode with someone of suitable age and discretion who resides there." This is precisely what occurred here. Based on the private process server's sworn affidavit, Mr. Atassi determined 3023 Sherill Avenue, Jamestown, NC 27282 was a verified address and dwelling place of Defendant Green. Mrs. Tammy Gordon confirmed Defendant Green resided with her at the location, and accepted service. Therefore, substitute service was effectuated at Defendant Green's North Carolina residence in accordance with federal law. The existence of a Connecticut address does not undermine valid service.

Most importantly, Defendant Green has actual notice of the proceedings, as evidenced by her responsive pleadings, and has suffered no material harm as a result of the brief delay in service. Because good cause exists, the Defendant's Motion to Dismiss on improper service grounds raised in both the initial answer and amended answer should be stricken.

CONCLUSION

The Plaintiff moves to strike Defendant Green's Motion to Dismiss. In light of the circumstances, a dismissal at this stage of the proceedings on improper service grounds would be an extreme sanction. If the Court finds that service is not sufficient, however, the Plaintiff humbly requests additional time to perfect service against Defendant Green.

Dated: July 15, 2025

Respectfully submitted,

/s/ Sue-Ann Robinson
Sue-Ann Robinson, Esq.
FBN: 29463

614 S. Federal Highway
Fort Lauderdale, FL 33301
Telephone: (754) 801-0897
Email: sueann@frontlinefirm.com
Pro hac vice

/s/ Gabrielle Higgins
Gabrielle Higgins, Esq.
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Pro hac vice

WALLIS, BOWENS, AVERHART & ASSOCIATES, PLLC
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5500 McNeely Drive, Ste. 102
Raleigh, North Carolina 27612
T: 919-741-6798
saleisha@wbaalaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 15, 2025, a true and correct copy of the foregoing was furnished via electronic mail and service, **to** all *counsel of record.*

Respectfully submitted,

/s/ Sue-Ann Robinson
Sue-Ann Robinson, Esq.
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saleisha@wbaalaw.com

Ex. A

RANNO INVESTIGATIVE SERVICES

Frontline Law
Attorney Sue-Ann Robinson
614 South Federal Highway
Fort Lauderdale, FL 33301

SUBJECT(S):	**E'MANI GREEN**	**INVESTIGATION TYPE:**	**SURVEILLANCE / PROCESS SERVICES**
SUBJECT(S):	**MALIK DYER**	**INTAKE DATE:**	**04/01/2025**
RIS FILE #	**25-1035-134**	**CLOSING DATE:**	**04/18/2025**

SCOPE OF INVESTIGATION:

Attorney Robinson,

Per your direction, Ranno Investigative Services, was requested to conduct a locate investigation for both above listed subjects, in an attempt to verify their current home addresses. Once located, a surveillance for each subject was requested in order to follow them to a public location in which they can then each be served with the provided federal law suit documents and recorded while being served.

PRE-INVESTIGATION:

Upon receipt of the investigation, Investigator Ranno began the investigation by running a series of computer database pulls in an attempt to locate both the current verified addresses for each subject. Investigator Ranno also ran motor vehicle database searches for each subject in an attempt to verify the current registered vehicle(s) for each subject. The results of those searches are included in this report.

Daejhanae Jackson (E'Mani Green) (Imani Green) - 221 Grandview Terrace, Hartford, CT
Verified Motor Vehicle:2018 Honda Accord (Gray) bearing NC license plate (KEK4391)

2018 Honda Accord Sedan 4 Door - 1HGCV1F35JA073464
State of Origin: NC
Series: SPORT
Price: $25,780
Type: PASSENGER CAR/LIGHT TRUCK
Data Source: Local

Features
Engine: 4 Cylinder 91 Cubic Inch
Transmission: L
Anti Lock Brakes: 4 wheel standard
Air Conditioning: Standard
Daytime Running Lights: Standard
Power Steering: Standard
Power Brakes: Standard
Power Windows: Standard
Security System: Passive Engine Immobilizer, Keyless Entry & Alarm
Roof: Manual sun/moon roof
Tilt Wheel: Standard
Front Wheel Drive: Yes
Four Wheel Drive: No

Registrants
DAEJHANAE IMANI JACKSON (Female) - EXPIRED
10/##/1996 (28)
Possible SSN: 042-96-####
Driver License Number: ##########
3023 SHERRILL AVE, JAMESTOWN, NC 27282-9814 GUILFORD
Tag Number: KEK4391 - NC
License Plate Type: Private
Previous Tag Number: KEK4391 - NC
Registration Dates: 03/08/2024 - 03/08/2024
Expiration Date: 01/31/2025

Owners
DAEJHANAE IMANI JACKSON (Female) - CURRENT
10/##/1996
Possible SSN: 042-96-####
Driver License Number: ##########
6035 NEAL TRAIL CIR APT 305, WALKERTOWN, NC 27051-3012 FORSYTH
Title Number: 77735423012511S
Title Issue Dates: 01/12/2023 - 01/12/2023

Lienholders
STATE EMPLOYEES CU - CURRENT
Business ID: 003381881037
PO BOX 27528, RALEIGH, NC 27611-7528 WAKE

50 Highland Avenue, Suite 2, Middletown, CT 06457
Phone: (800) 572-8806 / Cell: (860) 305-7640

RANNO INVESTIGATIVE SERVICES

Malik Dyer - 81 Burlington Street, Hartford, CT 06112
Verified Motor Vehicle: 2014 Infinity Q50 (Gray) bearing a CT license plate (BM84757)

2014 Gray Infiniti Q50 Sedan 4 Door - JN1BV7AR9EM701882
State of Origin: CT
Price: $38,950
Data Source: Local
Series: BASE/PREMIUM/SPORT
Type: PASSENGER CAR/LIGHT TRUCK

Features
Engine: 6 Cylinder 226 Cubic Inch
Transmission: S
Air Conditioning: Standard
Power Steering: Standard
Power Windows: Standard
Anti Lock Brakes: 4 wheel standard
Daytime Running Lights: Standard
Power Brakes: Standard
Security System: Passive Engine Immobilizer, Keyless Entry & Alarm
Roof: Power sun/moon roof
Front Wheel Drive: No
Tilt Wheel: Standard
Four Wheel Drive: Yes

Registrants
MALIK ST PATRICK (Male) - CURRENT
06/##/1996 (28)
Driver License Number: #########
Possible SSN: 040-96-####
81 BURLINGTON ST, HARTFORD, CT 06112-1702 HARTFORD

SUMMARY OF INVESTIGATION:

On April 7, 2025, *at approximately 12:00 pm, Investigator Ranno departed for Hartford, CT.*

At approximately 12:30 pm, Investigator Ranno arrived in the vicinity of the verified address for E'mani Green, (Daejhanae Jackson), at 221 Grandview Terrace, Hartford, CT. Upon arrival, the residence was observed as a two family white residence with black trim. A detached single bay garage was located behind the residence with the driveway on the right side of the property. Upon driving past the residence, several vehicles were observed parked in the driveway, however, the subject's confirmed 2018 gray Honda Accord bearing a North Carolina license plate (KEK-4391) was not present. Investigator Ranno established a surveillance position and awaited the subject's return.

At approximately 1:00 pm, the subject had not returned to the residence. Surveillance continued.

At approximately 2:00 pm, the subject had not returned to the residence. Due to the lack of activity from the subject, Investigator Ranno then departed for the address located for the second subject, Malik Dyer, in Hartford, CT.

At approximately 2:20 pm, Investigator Ranno arrived in the vicinity of the subject, Malik Dyer's, residence located at 81 Burlington Street in Hartford, CT. Upon arrival, the residence was observed as a single family tan shingled residence with no garage. Located to the right of the residence was a short driveway with two vehicles present. Neither vehicle was the subject's verified vehicle, a 2014 gray Infinity Q50 bearing a CT license plate (BM-84757). Investigator Ranno established a surveillance position with a view of the residence awaiting the subject's arrival.

At approximately 3:00 pm, the subject had not yet returned to the residence. Surveillance continued.

At approximately 4:00 pm, the subject had not yet returned to the residence. Surveillance continued.

At approximately 5:00 pm, due to neither subject being observed on this date, the surveillance / investigation was discontinued for the date.

At approximately 5:30 pm, Investigator Ranno arrived at the home office.

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On April 11, 2025, *at approximately 1:00 pm, Investigator Ranno departed for Hartford, CT.*

At approximately 1:30 pm, Investigator Ranno arrived in the vicinity of the verified address for E'mani Green, (Daejhanae Jackson), at 221 Grandview Terrace, Hartford, CT. Upon arrival, the residence was observed as a two family white residence with black trim. A detached single bay garage was located behind the residence with the driveway on the right side of the property. Upon driving past the residence, several vehicles were observed parked in the driveway, however, the subject's confirmed 2018 gray Honda Accord bearing a North Carolina license plate (KEK-4391) was not present. Investigator Ranno established a surveillance position and awaited the subject's return.

At approximately 2:00 pm, the subject had not returned to the residence. Surveillance continued.

At approximately 3:00 pm, the subject had not returned to the residence. Due to the lack of activity from the subject, Investigator Ranno then departed for the address located for the second subject, Malik Dyer, in Hartford, CT.

At approximately 3:18 pm, Investigator Ranno arrived in the vicinity of the subject, Malik Dyer's, residence located at 81 Burlington Street in Hartford, CT. Upon arrival, the residence was observed as a single family tan shingled residence with no garage. Located to the right of the residence was a short driveway with two vehicles present. Neither vehicle was the subject's verified vehicle, a 2014 gray Infinity Q50 bearing a CT license plate (BM-84757). Investigator Ranno established a surveillance position with a view of the residence awaiting the subject's arrival.

At approximately 4:00 pm, the subject had not yet returned to the residence. Surveillance continued.

At approximately 5:00 pm, the subject had not yet returned to the residence. Surveillance continued.

At approximately 6:00 pm, due to neither subject being observed on this date, the surveillance / investigation was discontinued for the date.

At approximately 6:30 pm, Investigator Ranno arrived at the home office.

On April 12, 2025, *at approximately 7:00 am, Investigator Ranno departed for Hartford CT.*

At approximately 7:30 am, Investigator Ranno arrived in the vicinity of the subject's residence located at 221 Grandview Terrace in Hartford, CT. Upon arrival, several vehicles were located in the driveway, however, the subject's gray Honda Accord bearing a North Carolina license plate (KEK-4391) was not observed. Investigator Ranno established a surveillance position and awaited activity from the subject.

At approximately 8:00 am, the subject had not yet been observed. Surveillance continued.

At approximately 9:00 am, the subject had not yet been observed. Surveillance continued.

At approximately 10:00 am, due to the subject, not being present at the residence, Investigator Ranno terminated the surveillance for the date.

At approximately 10:30 am, Investigator Ranno arrived at the home office.

On April 13, 2025, *after several attempt to locate the motor vehicles of each subject at their perspective addresses, to no avail, Investigator Ranno then ran a license plate capture program for each vehicle. In doing so, it showed that subject, E'mani Green, frequently travels back and forth between Connecticut and North Carolina with the last captured location*

and date of her vehicle being on November 1, 2024 in Windsor, CT on Interstate 91. With that information, it could not be verified that she was currently in the State of Connecticut.

View More Images	View More Images	Interstate 91 Windsor, CT 06095	1	969	0.1%	11/01/2024 10:46:48 PM	11/01/2024 10:46:48 PM	0 0 1 0 04/11/25	DAY
View More Images	View More Images	1801 New Hope Church Road Raleigh, NC 27609	1	977	0.1%	10/07/2024 11:22:08 AM	10/07/2024 11:22:08 AM	0 0 0 1 04/11/25	DAY
View More Images	View More Images	1351 Sumner Boulevard Raleigh, NC 27616	1	766	0.1%	09/06/2024 2:36:35 PM	09/06/2024 2:36:35 PM	0 0 0 1 04/11/25	DAY
View More Images	View More Images	250 Farmington Avenue Hartford, CT 06105	1	948	0.1%	06/26/2024 8:36:17 PM	06/26/2024 8:36:17 PM	0 0 0 1 04/11/25	DAY
View More Images	View More Images	904 Redland Drive McLeansville, NC 27301	4	241	1.7%	11/08/2023 12:22:28 AM	11/28/2023 9:01:26 PM	0 0 0 4 04/11/25	NIGHT
View More Images	View More Images	4202 South North Carolina Highway 150 Lexington, NC 27295	2	105	1.9%	09/12/2023 1:28:10 AM	09/14/2023 6:50:47 AM	0 0 0 2 04/11/25	NIGHT
View More Images	View More Images	5503 Weslo Willow Circle Greensboro, NC 27409	1	441	0.2%	04/05/2023 2:23:55 PM	04/05/2023 2:23:55 PM	0 0 0 1 04/11/25	DAY

Investigator Ranno then ran the same search on the motor vehicle being driven by Mr. Dyer. In doing so, it was observed that he also takes trips between Connecticut and North Carolina frequently. The last observation of his vehicle was on September 25, 2024, in Bloomfield, CT. With that information, it could not be verified that she was currently in the State of Connecticut.

Image	Plate	Location	Sightings	Total LPR Visits	% Seen/Visit	First Seen	Last Seen	Location Score	Time Most Seen
View More Images	View More Images	3408 Britton Drive Bloomfield, CT 06002	1	742	0.1%	09/25/2024 2:27:33 PM	09/25/2024 2:27:33 PM	0 0 0 1 04/11/25	DAY
View More Images	View More Images	333 North Main Street West Hartford, CT 06117	1	254	0.4%	09/10/2024 3:57:53 PM	09/10/2024 3:57:53 PM	0 0 0 1 04/11/25	DAY
View More Images	View More Images	unavailable East Hartford, CT 06108	1	983	0.1%	08/20/2024 9:52:00 PM	08/20/2024 9:52:00 PM	0 0 0 1 04/11/25	DAY
View More Images	View More Images	111 Central Avenue East Hartford, CT 06108	2	818	0.2%	05/24/2024 4:25:32 AM	06/24/2024 7:00:28 AM	0 0 0 2 04/11/25	NIGHT
View More Images	View More Images	20 Kensington Street Hartford, CT 06120	1	786	0.1%	04/20/2024 2:35:13 AM	04/20/2024 2:35:13 AM	0 0 0 1 04/11/25	NIGHT

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Phone: (800) 572-8806 / Cell: (860) 305-7640

On April 14, 2025, *At approximately 5:30 am, Investigator Ranno departed for Hartford CT.*

At approximately 6:00 am, Investigator Ranno arrived at the subject's address located at 221 Grandview Terrace in Hartford, CT. Upon arrival, the subject's gray Honda Accord bearing a North Carolina license plate (KEK04391) was observed, parked in the driveway with several other vehicles. Investigator Ranno established a surveillance position with a view of the end of the driveway.

At approximately 7:00 am, there has been no activity from the subject. Surveillance continued.

At approximately 8:00 am, there has been no activity from the subject. Surveillance continued.

At approximately 9:00 am, the subject's vehicle was observed as it was pulled out of the driveway. The vehicle was then observed as it parked on Grandview Terrace. A black male them exited from the vehicle and entered the front door of the residence. A moment later, a brown colored sedan, Honda Accord with CT license plates, pulled out of the driveway and parked on the street. The same black male then exited that vehicle and boarded the subject's vehicle. He then pulled the vehicle back into the driveway, boarded the other Honda, and departed from the area. Surveillance continued.

At approximately 10:00 am, the subject's vehicle remained present. No activity was observed. Surveillance continued.

At approximately 11:00 am, the subject's vehicle remained present. No activity was observed. Surveillance continued.

At approximately 12:00 pm, due to the lack of activity from the subject, but now knowing the subject does reside at this address, Investigator Ranno terminated the investigation for this date.

At approximately 12:30 pm, Investigator Ranno arrived at the home office.

On April 16, 2025, *At approximately 6:00 am, Investigator Ranno departed for Hartford CT.*

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Phone: (800) 572-8806 / Cell: (860) 305-7640

RANNO INVESTIGATIVE SERVICES

At approximately 6:30 am, Investigator Ranno arrived at the subject's address located at 221 Grandview Terrace in Hartford, CT. Upon arrival, the subject's gray Honda Accord bearing a North Carolina license plate (KEK04391) was

observed, parked in the driveway with several other vehicles. Investigator Ranno established a surveillance position with a view of the end of the driveway.

At approximately 7:00 am, there has been no activity from the subject. Surveillance continued.

At approximately 8:00 am, there has been no activity from the subject. Surveillance continued.

At approximately 9:00 am, there has been no activity from the subject. Surveillance continued.

At approximately 10:00 am, there has been no activity from the subject. Surveillance continued.

At approximately 11:00 am, there has been no activity from the subject. Surveillance continued.

At approximately 12:00 pm, there has been no activity from the subject. Surveillance continued.

At approximately 12:30 pm, due to the lack of activity from Ms. Green, Investigator Ranno terminated the surveillance for the date.

At approximately 1:00 pm, Investigator Ranno arrived at the home office.

Note: *Later at the home office, Investigator Ranno provided client with an update of the status of the investigation. It was requested to continue to attempt to serve both parties, and to now serve them any way possible, as opposed to following them to a public location only and serving them at that location. Investigator Ranno requested additional retainer(s) for each party. Investigator Ranno was then requested to provide a report to date, in order to receive authorization for additional retainer(s).*

Respectfully Submitted,

Raymond C. Ranno, LPI
Ranno Investigative Services

50 Highland Avenue, Suite 2, Middletown, CT 06457
Phone: (800) 572-8806 / Cell: (860) 305-7640

Ex. B

AFFIDAVIT OF SERVICE
UNITED STATES DISTRICT COURT
WESTERN District of North Carolina

Case Number: 3:24-CV-01002

Plaintiff: **SALLAMONDRA ROBINSON, Individually and Personal Representative of the Estate of SHANQUELLA ROBINSON, Deceased**
vs.
Defendant: **E'MANI GREEN, ALYSSE HYATT, MALIK DYER, WENTER DONOVAN, KHALIL COOKE, NAZEER TYREE WIGGINS, UNITED STATES DEPARTMENT OF STATE and THE FEDERAL BUREAU OF INVESTIGATION**

For: SUE-ANN ROBINSON
FRONTLINE LAW

Received by Caplan, Caplan & Caplan Process Servers on the 6th day of May, 2025 at 2:12 pm to be served on **E'MANI GREEN, 3023 SHERRILL AVENUE, JAMESTOWN, NC 27282**. I, Houssam Atasss, being duly sworn, depose and say that on the 7th day of May, 2025 at 9:40 am., executed service by delivering a true copy of the **SUMMONS, VERIFIED AMENDED COMPLAINT (JURY TRIAL DEMANDED), NOTICE TO ESTE COURT OF REMOVAL TO FEDERAL COURT and EXHIBITS** in accordance with state statutes in the manner marked below:

( ) INDIVIDUAL SERVICE: Served the within-named person by delivering a true copy of pleadings and informed said person of the contents therein,with the date, hour and intials of service endorsed thereon by me, to in compliance with State Statutes.

(X) SUBSTITUTE SERVICE: By serving M/S. Tammy Gordon as Co-Resident. Served the within-named person residing with defendant/witness, over the age of 15, by delivering a true copy of pleadings and informed said person of the contents therein, with the date, hour and intials of service endorsed thereon by me in compliance with Florida State Statute.

( ) SUBSTITUTE SERVICE D/B/A: By serving _____ as _____. Served the within-named person over the age of 15, by delivering a true copy of pleadings and informed said person of the contents therein, with the date, hour and intials of service endorsed thereon by me after 2 or more attempts to serve the owner have been made at the placeof business in compliance with Florida State Statute. Attempts were made: Date_____ Time:_____ and Date:_____Time:_____

( )SERVED:Served a Authorized person by delivering a true copy with date and hour of service endorsed to _____ as _____ who stated they are authorize to accept

( ) POSTED SERVICE: After attempting service on ___/___/___ at _____ and on ___/___/___ at _____ to a conspicuous place on the property described hereinwith the datehour and intials of service endorsed thereon by me according to State Statue

( ) POSTED SERVICE: To a conspicuous place on the property described hereinwith the date, hour and intials of service endorsed thereon by me according to State Statute

( ) NON SERVICE: For the reason detailed in the Comments below.

Military Status: ( ) Yes or ( ) No If yes, what branch? Refused

Marital Status: ( ) Married or ( ) SingleName of Spouse Refused

COMMENTS: _____

Under penalties of perjury, I declare that I have read the foregoing Affidavit of Service / Return of Service and that the facts stated in it are true. I certify that I have no interest in the above action, am of legal age and service was made within this state by an officer authorized to serve process where the person was served.

Subscribed and Sworn to before me on the 14th day of May, 2025 by the affiant who is personally known to me.

NOTARY PUBLIC

Amy M Simmons
NOTARY PUBLIC
Forsyth County, NC
My Commission Expires January 07, 2030

PROCESS SERVER # N/A
Appointed in accordance with State Statutes

Caplan, Caplan & Caplan Process Servers
351 SW 136th Avenue
Suite 207
Davie, FL 33325
(305) 374-3426

Our Job Serial Number: 2025017108

UNITED STATES DISTRICT COURT
for the
Western District of North Carolina

SALLAMONDRA ROBINSON,
INDIVIDUALLY AND AS
PERSONAL REPRESENTATIVE OF
THE ESTATE OF SHANQUELLA ROBINSON,
DECEASED

Plaintiff

v.

Civil Action No. 3:24-cv-01002

E'MANI GREEN, ALYSSE HYATT,
MALIK DYER, WENTER DONOVAN,
KHALIL COOKE, NAZEER TYREE WIGGINS,
UNITED STATES DEPARTMENT OF STATE, AND

Defendant

5/7/25
9:40 AM 10
N/A.
N/A.

SUMMONS IN A CIVIL ACTION

TO: ***(Defendant's name and address)***
E'Mani Green
3023 Sherrill Avenue
Jamestown, NC 27282

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) – or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12(a)(2) or (3) – you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Frontline Law
c/o Sue-Ann Robinson, Esq.
614 S. Federal Highway
Fort Lauderdale, FL 33301
Telephone: (754) 801-0897
Email: sueann@frontlinefirm.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Katherine H. Simon

Date 12/30/2024

Katherine Hord Simon, Clerk
United States District Court

Unassigned

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