# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

RURAL ROUTE 3 HOLDINGS, LP.,

Plaintiff,

Case No.

v.

PATRICK A.P. DE MAN,

Defendant.

RE: Sections 1125(a) and (d) of the Lanham Act, 15 U.S.C. §§1125(a) and (d); Articles 26 and 29 of the Puerto Rico Trademark Act, P.R. Laws Ann. Tit. 10, §§223w and 223z; Damages pursuant to Article 1802 of the Puerto Rico Civil Code, P.R. Laws Ann. Tit. 31, §5141

### **COMPLAINT**

COMES NOW plaintiff Rural Route 3 Holdings, LP ("RR3"), through its undersigned counsel, and respectfully submits its Complaint for Damages and Injunctive Relief against defendant Patrick de Man, and states:

### PRELIMINARY STATEMENT

RR3 is the 99% limited partner of Aspire Commodities LP ("Aspire"). Defendant Patrick de Man worked for Aspire and its affiliate, Raiden Commodities LP ("Raiden"). Mr. de Man went from working for both entities, to a disgruntled former employee who stole corporate property and then ransomed that data for \$1,000,000. He also filed a lawsuit in state court against Aspire, Raiden and each entity's principal, Adam Sinn, among others, falsely claiming that he is an owner of Aspire and Raiden.

Most recently, Mr. de Man registered and began using the domain name "ruralroute3.holdings," which is virtually identical to RR3's tradename and registered "ruralroute3holdings" domain name. There is no good faith reason for Mr. de Man to be using

the name "ruralroute3.holdings.com." The only purpose for Mr. de Man's use of that name is to attempt to confuse the market into thinking he is associated with RR3 when he is not and to injure RR3, Aspire and Mr. Sinn. Mr. de Man's intentional, bad faith use of the name "ruralroute3.holdings" violates Sections 1125(a) and (d) of the Lanham Act, causes damages sanctionable pursuant to Article 1802 of the Civil Code, and should be stopped immediately.

#### THE PARTIES

- 1. Defendant Patrick de Man is of legal age and a resident of Dorado, Puerto Rico.
- 2. RR3 is a Texas limited partnership engaged in the business of investing in early stage companies and private funds, among other things. RR3's general partner is Rural Route 3 Management, LLC, and its principal offices are located at 7800 Dallas Parkway, Suite 360, Plano TX 75024.

#### **JURISDICTION**

3. This Court has federal question jurisdiction pursuant to 28 U.S.C. § 1331 and supplemental jurisdiction over RR3's ancillary state law claims pursuant to 28 U.S.C. § 1367.

### **VENUE**

4. This is the proper venue for this action pursuant to 28 U.S.C. § 1391.

### THE FACTS

- 5. RR3 invests in early stage companies and private funds, among other things.
- 6. On April 20, 2016, RR3 registered, and it currently uses, the domain name "ruralroute3holdings.com" in its business operations. *See*, ICANN WHOIS, copy of which is included as **Exhibit A** and Printout from https://dcc.godaddy.com/manage/ruralroute3holdings.com/settings, copy of which is included as **Exhibit B**.

- 7. RR3's consistent presentation of its identity and business orientation is critical to its receipt of attractive investment opportunities.
- 8. RR3's name has no connection to its or any other business. Rural Route 3 is the name of the country road in Illinois on which RR3's principal, Adam Sinn, grew up. RR3 has done business under its tradename since 2012 and used the "ruralroute3holdings.com" domain name since April 2016. *See*, **Exhibit A** and Copy of Certificate of Formation included as **Exhibit C**.
- 9. Mr. de Man used to work for a RR3 affiliate named Aspire Commodities, LP ("Aspire"). RR3 is the 99% limited partner of Aspire.
- 10. As a result of his work for Aspire, Mr. de Man has long known of RR3's existence, its name and its use of the "ruralroute3holdings.com" domain name. Mr. de Man has invested jointly with RR3 in at least one project and thus regularly receives and sends emails to RR3 representatives at RR3's "ruralroute3holdings.com" domain.
- 11. On June 22, 2017, the domain name "ruralroute3.holdings" was registered. The next day, in connection with the business in which both RR3 and Mr. de Man jointly participate, Mr. de Man identified his association with the domain name "ruralroute3.holdings." He copied himself on an email, using the email address "patrick@ruralroute3.holdings" and instructed the others on that email to "[p]lease note my new email address." A copy of Mr. de Man's email is attached hereto as **Exhibit D**.
- 12. Mr. de Man has no interest in, and has never claimed an interest in RR3. Mr. de Man has nothing to do with RR3's business.
- 13. Mr. de Man uses and associates himself with the name "ruralroute3.holdings" in interstate commerce as the attached email demonstrates.

- 14. Mr. de Man's use of the name "ruralroute3.holdings" in his business dealings is certain to cause confusion in RR3's market and specifically among (1) those involved with (directly or as customers) the specific business in which RR3 and Mr. de Man jointly participate; (2) brokers and funds who bring investment opportunities to RR3; and (3) entities who are seeking investment funds.
- 15. The name "ruralroute3.holdings" is virtually identical to RR3's tradename and its use of the "ruralroute3holdings.com" domain in its business.
- 16. There is no good faith, legitimate business reason -- none -- for Mr. de Man to have registered or to use the domain name "ruralroute3.holdings," in any context, but there is especially no reason for Mr. de Man to use that name in connection with the business in which both he and RR3 participate. Mr. de Man could have affiliated his investment activities with an infinite number of symbols, names or words, or combinations thereof. Despite that infinite number of options, Mr. de Man chose to use the name of the road on which Mr. Sinn grew up and the name RR3 has used for over five years. *See*, **Exhibit C**.
- 17. Mr. de Man has not chosen to associate his investment activities with the name "ruralroute3.holdings" from any good faith, legitimate business reason, but solely out of a bad faith intent to confuse the market, to improperly trade on RR3's goodwill, to create the inaccurate impression that he is affiliated with RR3 and Adam Sinn, to potentially receive information to which he is not entitled, and/or simply to harass RR3 and potentially harm Aspire by harming its 99% limited partner, RR3.

### **COUNT I**

### Violation of Section 1125(a) of the Lanham Act and damages arising therefrom

- 18. RR3 incorporates herein by reference the allegations in paragraphs 1-17.
- 19. Mr. de Man does business in interstate commerce -- and in the same markets and business segments as RR3 -- using the name "ruralroute3.holdings."
- 20. That name is virtually identical to RR3's tradename and RR3's registered domain name "ruralroute3holdings.com."
- 21. Mr. de Man's use of "ruralroute3.holdings" will cause confusion among RR3's business partners and in the larger market/business community in which RR3 and Mr. de Man operate.
- 22. Mr. de Man is using "ruralroute3.holdings" in bad faith with knowledge of RR3's name and registered domain name, without any legitimate business reason and with the specific intent to cause marketplace/business confusion, in order to potentially receive information intended for RR3 and to which he is not entitled, to create the inaccurate impression that he is associated with RR3 and/or Mr. Sinn, to unjustly trade on RR3's goodwill and/or to harass RR3 and its principal, Adam Sinn.
  - 23. Mr. de Man's bad faith actions violate 15 U.S.C. § 1125(a).
- 24. No monetary award can compensate RR3 for the risk of harm Mr. de Man may be able to inflict upon RR3 through his use of a virtually identical name to that of RR3. The risk of harm to RR3 from Mr. de Man's continued use of the name "ruralroute3.holdings" is certainly higher than the harm Mr. de Man will suffer from being ordered to cease using "ruralroute3.holdings" since that name has no inherent connection to any business and has no

goodwill beyond that created by RR3. That is especially true since Mr. de Man registered "ruralroute3.holdings" on June 22, 2017, and began using it just days ago, on June 23, 2017.

25. RR3 is entitled to damages, including attorneys' fees, and to an injunction preventing Mr. de Man's bad faith, illegal and unjustified use of the "ruralroute3.holdings" name.

### **COUNT II**

### Violation of Section 1125(d) of the Lanham Act and damages arising therefrom

- 26. RR3 incorporates by references the allegations in paragraphs 1-25.
- 27. RR3 has done business under its tradename since 2012 and used the "ruralroute3holdings.com" domain name since April 2016. *See*, **Exhibits A** and **C**.
- 28. Mr. de Man's use and registration of "ruralroute3.holdings" in June, 2017, were done in bad faith and with the purpose of causing marketplace/business confusion. Furthermore, Mr. de Man's actions were carried out with the intent to profit from the "ruralroute3holdings.com" domain, either by receiving information intended for RR3 to which he is not entitled or to unfairly trade on RR3's goodwill.
- 29. As such, Mr. de Man's bad faith actions also constitute a violation of 15 U.S.C. §1125(d). *See, for example, Matal v. Tam,* 137 S. Ct. 1744, 1753 (2017).
- 30. Pursuant to 15 U.S.C. §1125(d)1(C), this Honorable Court should order the forefeiture or cancellation of the domain name "ruralroute3.holdings" or the transfer of such domain name to RR3.
- 31. RR3 is also entitled to damages, including attorneys' fees, and to an injunction preventing Mr. de Man's bad faith, illegal and unjustified use of the "ruralroute3.holdings" domain.

### **COUNT III**

### Violation of P.R. Laws Ann. Tit. 10, §223w

- 32. RR3 incorporates by reference the allegations in paragraphs 1-31.
- 33. Mr. de Man's actions as described above also constitute a violation of RR3's rights as owner of the protected tradename pursuant to P.R. Laws Ann. Tit. 10, §223w, which establishes a cause of action under Puerto Rico law for trademark infringement similar to Section 1125(a) of the Lanham Act, 15 U.S.C. §1125(a).
- 34. Thus, RR3 is entitled to damages and injunctive relief pursuant to P.R. Laws Ann. tit. 10, §223w.

### **COUNT IV**

### Violation of P.R. Laws. Ann. Tit. 10, §223z

- 35. RR3 incorporates by reference the allegations in paragraphs 1-34.
- 36. Mr. de Man's actions, as described above, also constitute a violation of RR3's rights as owner of the domain "ruralroute3holdings.com" pursuant to P.R. Laws Ann. Tit. 10, \$223z, which establishes a cause of action under Puerto Rico law for trademark infringement through a domain name similar to Section 1125(d) of the Lanham Act, 15 U.S.C. §1125(d).
- 37. Further, pursuant to §223z, there is a presumption that the marketplace will be confused by Mr. de Man's use of the domain "ruralroute3.holdings.com" since the domain registered by Mr. de Man in bad faith is substantially similar to RR3's protected domain.
  - 38. RR3 is therefore entitled to damages pursuant to P.R. Laws Ann. Tit. 10, §223z.

### **COUNT V**

### Damages pursuant to Article 1802 of the Puerto Rico Civil Code

39. RR3 incorporates by reference the allegations in paragraphs 1-38.

- 40. Pursuant to Article 1802 of the Puerto Rico Civil Code, "those who by action or omission cause harm to another, intervening guilt or negligence, are obliged to repair the damage caused." Article 1802 of the civil Code, Laws of P.R. Ann. Tit. 31, §5141.
- 41. Article 1802 of the Civil Code, within its ample scope, affords protection from the misappropriation of a business's organization and expenditure of labor, skill and money by another for that other person's undeserved advantage. *See*, *Aguadilla Paint Center*, *Inc. v. Esso Standard Oil Co.*, 183 D.P.R. 901 (2011).
- 42. "An action for unfair competition lies where a competitive injury occurs, i.e. palming off one's goods as those of a business adversary or passing off a competitor's product as one's own . . . as well as when the commercial advantage of one is misappropriated by another for its own use and profit." *In Re San Juan DuPont Plaza Hotel Fire Litigation*, 802 F.Supp. 624, 642 (D. P.R. 1992) (internal quotations and citations omitted).
- 43. By using a name virtually identical to RR3 in the same business segments as RR3, Mr. de Man is attempting to confuse the market, palm-off his services as those of RR3 and to misappropriate RR3's expenditure of labor, skill and money for Mr. de Man's undeserved advantage.
  - 44. Mr. de Man's actions threaten to confuse the market and thereby harm RR3.
- 45. Mr. de Man's wrongful and unlawful actions, as described above, are the proximate cause of the damages suffered so far, and that continue to be suffered, by RR3.
- 46. No monetary award can compensate RR3 for the risk of harm Mr. de Man may be able to inflict upon RR3 and Aspire through his use of a virtually identical name to that of RR3. The risk of harm to RR3 from Mr. de Man's continued use of the name "ruralroute3.holdings" is certainly higher than the harm Mr. de Man will suffer from being ordered to cease using

"ruralroute3.holdings" since that name has no inherent value to any business and has no goodwill

beyond that created by RR3. That is especially true since Mr. de Man registered

"ruralroute3.holdings" on June 22, 2017 and began using it on June 23, 2017. Mr. de Man will

not suffer much harm, if any, since he began using the offending domain name just a couple of

weeks ago.

REQUESTED RELIEF

WHEREFORE, RR3 respectfully requests this Honorable Court that it provides the

following relief:

1. Issue an injunction preventing Mr. de Man from directly or indirectly using the

name "ruralroute3.holdings" or any substantially similar name;

2. Order the forefeiture or cancellation of the domain name "ruralroute3.holdings"

or the transfer of such domain name to RR3;

3. Enter an award of damages sufficient to compensate RR3 for the attorneys' fees

incurred in prosecuting this action; and

4. Any other relief that it may deem just or proper.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, on this 11th day of July, 2017.

O'NEILL & BORGES LLC

Attorneys for Plaintiff
250 Muñoz Rivera Avenue, Suite 800

San Juan, PR 00918-1813

Tel: (787) 764-8181

Fax: (787) 753-8944

By: s/Alfredo F. Ramírez-Macdonald

Alfredo F. Ramírez-Macdonald

USDC No. 205208

E-mail: alfredo.ramirez@oneillborges.com

By: <u>s/ Ana Margarita Rodríguez-Rivera</u> Ana Margarita Rodríguez-Rivera USDC No. 227503

E-mail: ana.rodriguez@oneillborges.com

By: <u>s/ Arturo L.B. Hernández-González</u> Arturo L.B. Hernández-González USDC No. 304601

E-mail: arturo.hernandez@oneillborges.com

简体中文 <u>English</u> Français Русский Español العربية Portuguese

# **ICANN WHOIS**

www.ruralroute3holdings.com

Lookup

Showing results for: ruralroute3holdings.com

Original Query: www.ruralroute3holdings.com

# **Contact Information**

## **Registrant Contact**

Name: Registration Private

Organization: Domains By Proxy, LLC

Mailing Address: DomainsByProxy.com, Scottsdale Arizona 85260 US

Phone: +1.4806242599

Ext:

Fax: +1.4806242598

Fax Ext:

Email:ruralroute3holdings.com@domainsbyproxy.com

### **Admin Contact**

Name: Registration Private

Organization: Domains By Proxy, LLC

Mailing Address: DomainsByProxy.com, Scottsdale Arizona 85260 US

Phone: +1.4806242599

Ext:

Fax: +1.4806242598

Fax Ext:

Email:ruralroute3holdings.com@domainsbyproxy.com

### **Tech Contact**

Name: Registration Private

Organization: Domains By Proxy, LLC

Mailing Address: DomainsByProxy.com, Scottsdale Arizona 85260 US

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Phone: +1,4806242599

Ext:

Fax: +1.4806242598

Fax Ext:

Email:ruralroute3holdings.com@domainsbyproxy.com

### Registrar

WHOIS Server: whois.godaddy.com

URL: http://www.godaddy.com Registrar: GoDaddy.com, LLC

**IANA ID: 146** 

Abuse Contact Email:abuse@godaddy.com Abuse Contact Phone: +1.4806242505

### Status

Domain Status:clientTransferProhibited http://www.icann.org/epp#clientTransferProhibited Domain Status:clientUpdateProhibited http://www.icann.org/epp#clientUpdateProhibited Domain Status:clientRenewProhibited http://www.icann.org/epp#clientRenewProhibited Domain Status:clientDeleteProhibited http://www.icann.org/epp#clientDeleteProhibited

# **Important Dates**

Updated Date: 2016-04-20 Created Date: 2016-04-20

Registration Expiration Date: 2018-04-20

### Name Servers

NS49.DOMAINCONTROL.COM NS50.DOMAINCONTROL.COM

### Raw WHOIS Record

Domain Name: ruralroute3holdings.com Registry Domain ID: 2022945241 DOMAIN COM-VRSN Registrar WHOIS Server: whois.godaddy.com Registrar URL: http://www.godaddy.com Update Date: 2016-04-20T16:11:47Z Creation Date: 2016-04-20T16:11:47Z Registrar Registration Expiration Date: 2018-04-20T16:11:47Z Registrar: GoDaddy.com, LLC Registrar IANA ID: 146 Registrar Abuse Contact Email: abuse@godaddy.com Registrar Abuse Contact Phone: +1.4806242505 Domain Status: clientTransferProhibited http://www.icann.org/epp#clientTransferProhibited Domain Status: clientUpdateProhibited http://www.icann.org/epp#clientUpdateProhibited Domain Status: clientRenewProhibited http://www.icann.org/epp#clientRenewProhibited Domain Status: clientDeleteProhibited http://www.icann.org/epp#clientDeleteProhibited Registry Registrant ID: Not Available From Registry Registrant Name: Registration Private Registrant Organization: Domains By Proxy, LLC Registrant Street: DomainsByProxy.com Registrant Street: 14455 N. Hayden Road Registrant City: Scottsdale Registrant State/Province: Arizona Registrant Postal Code: 85260 Registrant Country: US Registrant Phone: +1.4806242599 Registrant Phone Ext: Registrant Fax: +1.4806242598 Registrant Fax Ext: Registrant Email: ruralroute3holdings.com@domainsbyproxy.com Registry Admin ID: Not Available From Registry Admin Name: Registration Private Admin Organization: Domains By Proxy, LLC Admin Street: DomainsByProxy.com Admin Street: 14455 N. Hayden Road Admin City: Scottsdale Admin State/Province: Arizona Admin Postal Code: 85260 Admin Country: US Admin Phone: +1.4806242599 Admin Phone Ext: Admin Fax: +1.4806242598 Admin Fax Ext:

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Admin Email: ruralroute3holdings.com@domainsbyproxy.com

Registry Tech ID: Not Available From Registry

Tech Name: Registration Private

Tech Organization: Domains By Proxy, LLC

Tech Street: DomainsByProxy.com Tech Street: 14455 N. Hayden Road

Tech City: Scottsdale

Tech State/Province: Arizona

Tech Postal Code: 85260

Tech Country: US

Tech Phone: +1.4806242599

Tech Phone Ext:

Tech Fax: +1.4806242598

Tech Fax Ext:

Tech Email: ruralroute3holdings.com@domainsbyproxy.com

Name Server: NS49.DOMAINCONTROL.COM Name Server: NS50.DOMAINCONTROL.COM

DNSSEC: unsigned

URL of the ICANN WHOIS Data Problem Reporting System:

http://wdprs.internic.net/

>>> Last update of WHOIS database: 2017-07-07T16:00:00Z <<<

For more information on Whois status codes, please visit https://www.icann.org/resources/pages/epp-status-codes-2014-06-16-en

The data contained in GoDaddy.com, LLC's WhoIs database, while believed by the company to be reliable, is provided "as is" with no guarantee or warranties regarding its accuracy. This information is provided for the sole purpose of assisting you in obtaining information about domain name registration records. Any use of this data for any other purpose is expressly forbidden without the prior written

permission of GoDaddy.com, LLC. By submitting an inquiry, you agree to these terms of usage and limitations of warranty. In particular,

you agree not to use this data to allow, enable, or otherwise make possible,

dissemination or collection of this data, in part or in its entirety, for any

purpose, such as the transmission of unsolicited advertising and and solicitations of any kind, including spam. You further agree not to use this data to enable high volume, automated or robotic electronic

processes designed to collect or compile this data for any purpose, including mining this data for your own personal or commercial purposes.

Please note: the registrant of the domain name is specified in the "registrant" section. In most cases, GoDaddy.com, LLC is not the registrant of domain names listed in this database.

Submit a Complaint for WHOIS
WHOIS Inaccuracy Complaint Form
WHOIS Service Complaint Form

WHOIS Compliance FAQs

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Domain Manager

Help

☐ Adam ☐

**Domains**

DNS 🗆

Settings

Help □

My Domains

# **Domain Settings**

Protected Registration is protecting your domain, but there's one last setup step
Complete setup.

# ruralroute3holdings.com

is set to automatically renew on 4/20/2018.

**Add Website** 

Manage Email

# **Contact Information**

**Your information is PRIVATE.** This is how your contact information appears to people who search for it online.

Domains By Proxy, LLC 14455 N. Hayden Road Scottsdale, Arizona United States 85260 +1.4806242599 Case 3:17-cv-01948-JAG Document 1-2 Filed 07/11/17 Page 2 of 3

ruralroute3holdings.com@domainsbyproxy.com

Hide personal information

Adam Sinn
200 Dorado Beach Drive
#3232 - Rtiz Carlton
Dorado, Puerto Rico
United States 00646
+1.9795757026
barry.hammond@gmail.com

Edit

We're taking email sent to ruralroute3holdings.com@domainsbyproxy.com and delivering it to barry.hammond@gmail.com.

Privacy email forwarding: On (with spam filtering) Edit

NOTE: To remove Domain Privacy, call support at (480) 505-8877.

# **Additional Settings**

Protected Registration: Set up needed

**NOTE:** You need to enable 2-step verification in order to set up Protected Registration. We'll text a code to your mobile phone. (Standard messaging rates apply.) Once set up, you will not be able to remove Protected Registration for 72 hours.

# **Set up Protected Registration**

Locking prevents unauthorized changes, including transfer to another registrar.

Domain lock: On

### Manage DNS

Transfer domain to another GoDaddy account (disabled)

# Case 3:17-cv-01948-JAG Document 1-2 Filed 07/11/17 Page 3 of 3 Transfer domain away from GoDaddy (disabled)

Get authorization code (disabled)

Delete domain (disabled)

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#### Form 207

Secretary of State P.O. Box 13697 Austin, TX 78711-3697 FAX: 512/463-5709

Filing Fee: \$750



### Certificate of Formation Limited Partnership

Filed in the Office of the Secretary of State of Texas Filing #: 801584021 04/19/2012 Document #: 418000340003 Image Generated Electronically for Web Filing

### Article 1 - Entity Name and Type

The filing entity being formed is a limited partnership. The name of the entity is:

### Rural Route 3 Holdings, LP

The name must contain the words "Limited Partnership," or "Limited," or the abbreviation "L.P.," "LP," or "Ltd." The name must not be the same as, deceptively similar to or similar to that of an existing corporate, limited liability company, or limited partnership name on file with the secretary of state. A preliminary check for "name availability" is recommended.

#### **Article 2 - Principal Office**

The address of the principal office in the United States where records of the partnership are to be kept or made available is set forth below:

### 3333 Allen Parkway<u>, #1605, Houston, TX, USA 77019</u>

### Article 3 - Registered Agent and Registered Office

☐A. The initial registered agent is an organization (cannot be limited partnership named above) by the name of:

### OR

☑B. The initial registered agent is an individual resident of the state whose name is set forth below:

#### Name:

### Adam C Sinn

C. The business address of the registered agent and the registered office address is:

### Street Address:

### 3333 Allen Parkway, #1605 Houston TX 77019

### **Consent of Registered Agent**

A. A copy of the consent of registered agent is attached.

OF

☑B. The consent of the registered agent is maintained by the entity.

### Article 4 - General Partner Information

The name and address of each general partner are as follows:

General Partner 1: (Business Name) Rural Route 3 Management, LLC

Address: 3333 Allen Parkway, #1605 Houston TX, USA 77019

### **Supplemental Provisions / Information**

A Limited Partner's right to sell an interest in the Partnership is restricted significantly, as explained in detail in the Limited Partnership Agreement on file in such Partnership's corporate records.

[The attached addendum, if any, is incorporated herein by reference.]

### **Effectiveness of Filing**

A. This document becomes effective when the document is filed by the secretary of state.

OR

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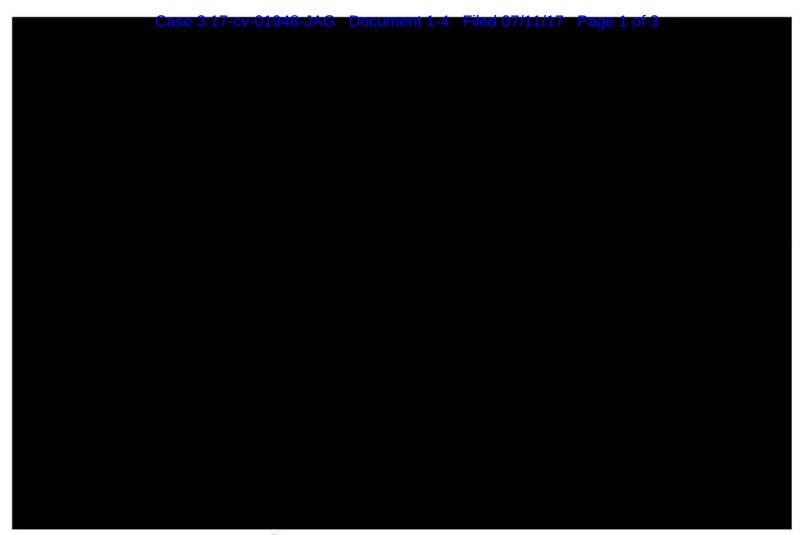
□B. This document becomes effective at a later date, which is not more than ninety (90) days from the date of its signing. The delayed effective date is:

### Execution

The undersigned affirms that the person designated as registered agent has consented to the appointment. The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument and certifies under penalty of perjury that the undersigned is authorized under the provisions of law governing the entity to execute the filing instrument.

Signature of General Partner 1: Kyle E. Carlton, Attorney-in-Fact for Adam C. Sinn, Manager of Rural Route 3 Management LLC, GP

FILING OFFICE COPY



From: Patrick de Man [mailto:pat.deman@gmail.com]

**Sent:** Friday, June 23, 2017 1:54 PM

To: 'Amy Odom' < Amy.Odom@mp2energy.com >; joonsup.park@gmail.com; 'Adam Sinn' < asinn@aspirecommodities.com >

Cc: 'Carey Jordan' < Carey.Jordan@mp2energy.com'>; Barry Hammond < Barry@ruralroute3holdings.com'>;

amanda.mussalli@mp2energy.com; patrick@ruralroute3.holdings

**Subject:** RE: April and May DGSP2

Thank you. Great that it finally ran again.

Please note my new email address.

Cheers, and have a good weekend!

Patrick.

From: Amy Odom [mailto:Amy.Odom@mp2energy.com]

Sent: Wednesday, June 21, 2017 2:47 PM

To: 'joonsup.park@gmail.com' <<u>joonsup.park@gmail.com</u>>; 'Adam Sinn (<u>asinn@aspirecommodities.com</u>)'

<asinn@aspirecommodities.com>; 'pat.deman@gmail.com' <pat.deman@gmail.com>

Cc: Carey Jordan < Carey.Jordan@mp2energy.com >; 'Barry Hammond' < Barry@ruralroute3holdings.com >

Subject: April and May DGSP2

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Have a great day!

Amy Odom
Director of Accounting
MP2 Energy
21 Waterway Avenue, Suite 450
The Woodlands, TX 77380
832.510.1055 phone
832.510.1128 fax
www.mp2energy.com



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