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Attorneys for Plaintiff Peter Todd

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

**PETER TODD**, an individual,  
  
Plaintiff,

v.

**SARAH MICHELLE REICHWEIN aka ISIS  
AGORA LOVECRUFT**, an individual,  
  
Defendant.

Case No. 4:19-cv-01751-DMR

**DECLARATION OF JEFFREY M.  
ROSENFELD IN SUPPORT OF  
PLAINTIFF'S MOTION FOR LEAVE TO  
SERVE SUMMONS AND COMPLAINT  
ON DEFENDANT BY ALTERNATIVE  
MEANS OR IN THE ALTERNATIVE TO  
EXTEND TIME TO COMPLETE  
SERVICE**

Date: June 27, 2019  
Time: 11:00 a.m.  
Ct rm: 3 – 4th Floor  
Before: Hon. Donna M. Ryu



1 I, Jeffrey M. Rosenfeld, declare as follows:

2 1. I am an attorney admitted to practice in the State of California and the United  
3 States District Court for the Northern District of California. I am a partner of the law firm  
4 of Kronenberger Rosenfeld, LLP, counsel of record for Plaintiff Peter Todd ("Plaintiff" or  
5 "Todd"). Unless otherwise stated, I have personal knowledge of the matters set forth  
6 herein.

7 2. A true and correct screenshot of Defendant's Twitter account, located at  
8 <twitter.com/isislovecruft> and associated with the Twitter handle "@isislovecruft,"  
9 displaying entries from March 26, 2019 through May 2, 2019, which I captured using the  
10 qSnap Screen Capture on May 2, 2019, is attached hereto as **Exhibit A**.

11 3. A true and correct screenshot of the Twitter account for Defendant's dog  
12 Merlin, located at <twitter.com/realwolfpupy> and associated with the Twitter handle  
13 "@realwolfpupy," displaying entries for all time, which I captured using the qSnap Screen  
14 Capture on May 2, 2019, is attached hereto as **Exhibit B**.

15 4. A true and correct screenshot of the Twitter account for Defendant's  
16 personal acquaintance, Nicole Aptekar, located at <twitter.com/nicoles> and associated  
17 with the Twitter handle "@nicoles," displaying entries from August 7, 2018 through May  
18 2, 2019, which I captured using the qSnap Screen Capture on May 2, 2019, is attached  
19 hereto as **Exhibit C**.

20 5. A true and correct screenshot of Plaintiff's April 5, 2019 post on Twitter  
21 confirming the filing of this lawsuit, including the comments thereto posted on or before  
22 April 8, 2019, is attached hereto as **Exhibit D**. As Exhibit D shows, as part of this Twitter  
23 chain, Peter Todd and Twitter user "devrandom" engaged in an exchange in which  
24 "devrandom" directed a message to Defendant's Twitter account about the identification  
25 of Defendant in the case-initiating documents. I have highlighted the relevant portion of  
26 Exhibit D with a red circle and red arrow.

27 6. A true and correct copy of an April 5, 2019 article entitled "Former Bitcoin  
28 Core Developer Accused of Rape, Sexual Assault, Files Defamation Lawsuit," published



1 on CoinSpice and located at <[https://coinspice.io/news/bitcoin-core-developer-accused-](https://coinspice.io/news/bitcoin-core-developer-accused-of-rape-sexual-assault-files-defamation-lawsuit/)  
2 of-rape-sexual-assault-files-defamation-lawsuit/>, is attached hereto as **Exhibit E**.

3 7. A true and correct copy of an April 6, 2019 article entitled, "Bitcoin Core's  
4 Peter Todd Fires Back at Sexual Assault Allegation," published on CCN and located at  
5 <<https://www.ccn.com/bitcoin-cores-peter-todd-fires-back-at-sex-assault-allegation/>>, is  
6 attached hereto as **Exhibit F**.

7 8. Because Plaintiff and I feared that Defendant would evade service,  
8 immediately upon filing this lawsuit, we attempted to locate and serve Defendant with  
9 process.

10 9. Numerous posts on Defendant's Twitter account, and the Twitter account  
11 of Defendant's dog Merlin, show photographs in the Bernal Heights, Noe Valley, and  
12 Mission areas of San Francisco.

13 10. Before my office filed this lawsuit, Plaintiff informed me that he did not know  
14 Defendant's legal name. Therefore, my firm engaged late private investigator David B.  
15 Fechheimer to identify Defendant's legal name and Defendant's residence. Attached  
16 hereto as **Exhibit G** is a true and correct copy of an investigative report about Defendant  
17 prepared by David B. Fechheimer and dated March 29, 2019.

18 11. Attached hereto as **Exhibit H** is a true and correct copy of a Declaration of  
19 Diligence dated April 9, 2019 and executed by process server Raoul Deleon of Express  
20 Network regarding his attempt to serve Defendant at 1389 Jefferson Street, No. C501,  
21 Oakland, CA, 94612. This address was identified in David B. Fechheimer's investigative  
22 report (Exhibit G) as a possible residence of Defendant.

23 12. Attached hereto as **Exhibit I** is a true and correct redacted copy of a  
24 LexisNexis Accurint background search on Defendant, which my office ran on March 29,  
25 2019. I have redacted personal information about Defendant from this report other than  
26 the listed addresses. The address 2261 Market Street, San Francisco, CA, 94114 is that  
27 of a commercial post office box facility, *i.e.* Mail Access.

28 13. Based on Defendant's frequent Twitter postings displaying locations in San



1 Francisco, I believe that Defendant is residing with a personal acquaintance in San  
2 Francisco. As such, my office ran background searches on Defendant's known personal  
3 acquaintances in San Francisco, namely Nicole Aptekar and Henry de Valence. Attached  
4 hereto as **Exhibit J** is a true and correct redacted copy of a LexisNexis Accurint  
5 background search on Nicole Aptekar, which my office ran on April 2, 2019. I have  
6 redacted personal information about Ms. Aptekar from this report other than her current  
7 listed address. Attached hereto as **Exhibit K** is a true and correct redacted copy of a  
8 LexisNexis Accurint background search on Henry de Valence, which my office ran on  
9 April 11, 2019. I have redacted personal information about Mr. de Valence from this report  
10 other than his current listed address.

11 14. Based on the suspected close relationship between Defendant and Ms.  
12 Aptekar, and given that Ms. Aptekar's reported address was in the Bernal Heights area  
13 of San Francisco where the majority of the photographs of Defendant's dog appear on its  
14 Twitter account located at <twitter.com/realwolfpuppy>, I suspected that Defendant was  
15 residing with Ms. Aptekar at 609 Precita Ave., San Francisco, CA. Thus, my office  
16 engaged a process server to perform a stakeout of this residence on April 5 through April  
17 7. Attached hereto as **Exhibit L** is a true and correct copy the Declaration of Diligence  
18 describing process server Kris Vorsatz's stakeout of 609 Precita Ave.

19 15. Attached hereto as **Exhibit M** is a true and correct copy of an email and the  
20 corresponding attachments that I sent to Defendant on April 16, 2019 at  
21 "isis@patternsinthevoid.net," informing Defendant of this lawsuit and requesting that  
22 Defendant waive service of process. I did not receive any error message or bounce-back  
23 notice after I sent this email.

24 16. Attached hereto as **Exhibit N** is a true and correct copy of Plaintiff's Notice  
25 of Lawsuit and Request to Waive Service of a Summons and Complaint, which my office  
26 sent to Defendant by U.S. Mail on April 16, 2019 to 2261 Market Street, Suite 325, San  
27 Francisco, CA 94114-1600. On April 18, 2019, my office sent the summons, complaint,  
28 and other case-initiating documents to 2261 Market Street, Suite 325, San Francisco, CA



1 94114-1600 by Certified Mail. This address is identified in the Accurant background  
2 reports for both Defendant and Henry de Valence. Attached hereto as **Exhibit O** is a true  
3 and correct copy of the Certified Mail receipt for the foregoing letter, dated April 18, 2019.

4 17. Attached hereto as **Exhibit P** is a true and correct screenshot of a Twitter  
5 direct message that my office sent to Defendant's Twitter account "@isislovecruft" on  
6 April 16, 2019.

7 18. On April 17, 2019, my office engaged private investigator Zach Fechheimer  
8 in an effort to locate Defendant. Mr. Fechheimer was unable to provide our office with  
9 information sufficient to locate or serve Defendant. Attached hereto as **Exhibit Q** is a true  
10 and correct copy of a declaration by Zach Fechheimer describing his efforts to locate  
11 Defendant.

12 19. Since before the filing of this suit, I have monitored Defendant's Twitter  
13 account and the Twitter account for Defendant's dog for any evidence of Defendant's  
14 location

15 20. As of the execution of this declaration, I do not know where Defendant is  
16 residing, and I do not know any other lawful tools that I could use to try to identify  
17 Defendant's residence.

18 I declare under penalty of perjury under the laws of the United States of America  
19 that the foregoing is true and correct and that this Declaration was executed on May 8,  
20 2019 in San Francisco, California.

21  
22 s/ Jeffrey M. Rosenfeld  
23 Jeffrey M. Rosenfeld  
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